

Local Plan Submission Version - summary of representations and officer responses

ID	Title	Number	Full Name	Organisation Details	Summary of representation	Summary of modification	Complies with the Duty to Co-operate?	Sound?	Legally compliant?	Officer response	Modification recommended by officer
LPS8	Introduction and background	1	Mr Michael Caulfield		<p>Respondent objects to the proposed housing development EN128 due to concerns that the chosen area for the proposed dwelling does not meet the principal outcomes stated in section 10 of the Local Plan. Respondent specifically refers to the Principal Outcomes under Policy SS8: (1) enable the sustainable development of the larger villages and maintain their role as rural service centres; and (2) protect the larger villages heritage and special character.</p> <p>Respondent builds on three reasons to the objection of the proposed housing development EN128. The first relates to the rural neighbourhood and local environment of the area. EN128 proposes to build 20 houses on a small greenfield site, however respondent argues this would not contribute to the sustainable development of Endon as a semi-rural neighbourhood that homes a variety of flora, fauna, wildlife and a bat colony (Dollis Field). The proposed development site also backs onto St Luke's Primary School's quiet wildlife area and areas of outdoor study. Respondent believes the development would be disruptive and harmful to the local environment and wildlife (a source of learning for the children) and therefore cannot see the development as sustainable and environmentally justifiable.</p> <p>The respondent raises a second reason relating to the heritage and special character of the local area. The respondent argues that the proposed dwellings would not fit in with the character of the area because the houses that surround the proposed development site have large gardens, driveways and a certain character that is in fitting with the local area.</p> <p>The final and third point relates to safety, traffic and the local school. The respondent highlights that the roads surrounding the proposed development would see a significant increase of traffic because Stoney Lane is a private road that can only support a single lane of traffic and Brookfield Avenue is a residential street with single yellow lines. The addition of 20 dwelling and possibly 40 additional cars could have a significant impact on traffic. Respondent also raises safety concerns of children and the elderly who are residents of the area if the development proceeds as large construction vehicles and lorries will constantly be passing, obstructing the roads and views of other drivers. At present Stoney Lane and other local paths are used by walkers and horse riders for country walks, as the area is very tranquil.</p> <p>Respondent highlights a key concern: additional cars on Brookfield Avenue. This would increase congestion towards the Hazelwood Road estate and between the two local schools. Pick-ups and drop-offs between the two schools would raise serious safety and congestion concerns. Similarly, Leek Road (A53) is very busy during pick-up and drop-off times.</p> <p>The respondent reminds the Council that the proposed</p>	Suggests that the proposed housing development EN128 does not go ahead.	Yes	No	Yes	<p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good. Also note para 32 NPPF which states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development would be severe.</p> <p>The Council must demonstrate that its Local Plan meets objectively assessed needs for housing and other land uses. The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating</p>	No

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					development has received many objections from immediate residents and many throughout community. The proposed housing development would seriously harm the green space, road safety, privacy and right of the local residents to enjoy a quiet and safe residential environment. Respondent therefore suggests that the Council find more suitable areas within Staffordshire Moorlands to accommodate the needs of additional housing and should not use the proposed site area.					<p>sustainable, self supporting communities as far as possible, and allows for further growth of an appropriate scale in larger villages (in accord with national green belt policy). Endon is categorised as a larger village.</p> <p>With regards housing densities, Policy H1(c) expects development to be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area. It is assumed that higher densities will be appropriate in locations which are accessible by public transport.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside." The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	
LPS29	Introduction and background	1	Mr Robert Moseley		The site at Wharf Road was added to the Plan at a later date, giving less time for it to be considered. It might have been better if local residents were asked where they thought the houses should go, rather than giving them a choice.		No	Yes	Yes	Three previous consultations have taken place on Local Plan sites and on each occasion anyone could put forward sites for consideration by the Council for inclusion in the plan.	No
LPS124	Introduction and background	1	Mrs Jennifer C Moreton		SMDC has refused to take any of the residents of Cheadle's comments into consideration since the Plan began. None of the development should go ahead because the traffic situation is very bad. This calls for a public enquiry which will uncover what is going on.	The traffic and congestion problems in Cheadle should be addressed before any further housing is considered. Furthermore, the Green Belt is not protecting Cheadle as it should. People have lost faith in SMDC.	No	No	No	<ul style="list-style-type: none"> • Previous responses and comments have been taken into account. • Land to the north of Cheadle near JCB is located in the Green Belt. Once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper reiterates this commitment. The Phase 2 Transport Study predicts that in 2031 general traffic growth plus additional trips generated by new housing and employment development will cause increased queuing and delays. There is limited scope to change junction characteristics due to the historically confined road 	No

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										structure, however the study recommends a package of mitigation measures which could provide some additional capacity to the overall network.	
LPS249	Introduction and background	1	David Dale	Derbyshire County Council	Derbyshire County Council (DCC) has no comments to make on the Local Plan Submission Version.					Comments noted.	No
LPS277	Introduction and background	1	Development Liaison Officer Spencer Jefferies	(see agent Amec) National Grid	National Grid has no comments to make in response to the Local Plan. They do, however, wish to be involved in the preparation, alteration and review of plans and strategies which may affect their assets.					Comments noted and contact details updated.	No
LPS280	Introduction and background	1	Joan Buck		<p>Respondent has attached representation submitted within the preferred options consultation Ref: LPPO1084 summarised below:</p> <ul style="list-style-type: none"> Legislation dictates that because of the wind turbine already on The Mount, houses cannot be built within 1,000/1,500m of it, depending on its height. The Mount is therefore unsuitable. There is land within Leek which is more appropriate to build on than The Mount. Exit junction both sides (Buxton Road and Ashbourne Road) is not safe in the winter and these plans will make it worse by an increase in congestion and further road damage. Development is disproportionately concentrated in Leek which is not as well equipped for development (such as road infrastructure) as other places. The Mount is used daily by people exercising and enjoying the views. Loss of trees and wildlife. There will be an increase in noise and pollution from extra vehicles. Development will be unsympathetic to the landscape character and quality of the area. A three-estate junction will be created on an already overstretched piece of road. The facilities (i.e health and education) do not exist to accommodate more residents, particularly as many will not already live in Leek. This will make these facilities less safe for everyone else. The building of homes would be disruptive to current residents. Population increase (40 per year over the last 100 years) does not reflect need for housing. According to the ONS, the need for housing in the Staffordshire Moorlands is 2,075 between 2011 and 2031. As 1,500 of these have already been built, only 575 are needed across the entire of the Staffordshire Moorlands and these plans place too many in Leek. ONS also says that jobs will increase by only 8 jobs within 				<p>The public open spaces/Local Green Spaces proposed by the Council are those mapped in the consultation Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. Mount Road is a vehicular highway.</p> <p>New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>The Council would assess residential schemes in proximity to approved wind turbines in accordance with Local Plan and NPPF amenity Policies, and ETSU (as amended) noise criteria etc. Note the Kniveden Farm turbine (SMD/2012/0760) was found acceptable by planning inspector on appeal and blade glint was not identified as an issue. Environmental Health conditions were attached to the consent pertaining to noise emissions. The Wind Turbines (Minimum Distance from Residential Premises) Bill 2012 was never enacted in Law, therefore has no status in either the determination of planning applications of wind turbines near housing, or conversely, housing near wind turbines.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022/LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where</p>	No	

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					<p>this period. Challenges the need for so many houses.</p> <ul style="list-style-type: none"> • Old mill buildings could be renovated. • Development should not take place until infrastructure is in place. • Because of Brexit the future is unknown and this land may need to be used for something else, i.e farming. • There are already many houses to buy or rent and the building of these are unnecessary. • Churnet View School has space to extend in its current location without needing to build elsewhere. 					<p>deemed appropriate).</p> <p>The consultation Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.</p> <p>The Council consults with SCC Education during Local Plan preparation, and SCC have indicated a need for additional first and middle- school land provision in Leek resulting from the town's development requirements. These are laid out in the Submission Version Local Plan. Site ADD01 is identified for the necessary expansion of Churnet View Middle School (if this site were allocated for the new first school site instead, middle school expansion would need to occur elsewhere in the town). Note SCC Education support both the location of the proposed Middle School expansion at Horsecroft; and the location of the new First School on the Mount, in the Local Plan (as the proposed location of the First School adjacent to the high school site offers potential for sharing of facilities e.g. playing fields).</p> <p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas. National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Preparation of the IDP involved consultation and work with infrastructure providers.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. The Mount sites LE022/ LE066/ LE128/ LE140/ LE142A/ LE142B were all</p>	

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										<p>subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development.</p> <p>Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area.</p> <p>Need for additional housing stems from a number of factors, for example household formation, immigration, linkages with future workforce, and other factors. The NPPF makes clear that household projections are the starting point for assessing housing needs; however these additional factors should also be taken in to account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration empty properties in the Moorlands, and the anticipated effects of Brexit. In 2017 the Government announced a public consultation over proposed changes to the way housing need is calculated by Local Authorities.</p>	
LPS369	Introduction and background	1	Mr Martin Webb		At various points throughout the Plan, references are made to consistency with the adopted Core Strategy. This approach is confusing because the Core Strategy is to be superseded by the Plan.	Any references to consistency with the Core Strategy within the new Local Plan should be deleted.		No	No	The Local Plan makes it clear that it will supersede the Core Strategy. References are made to the Core Strategy as it often provides the context for the policy in question.	No
LPS420	Introduction and background	1	Wainhomes (North West) Limited		At various points throughout the Plan, references are made to consistency with the adopted Core Strategy. This approach is confusing because the Core Strategy is to be superseded by the Plan.			No	No	The Local Plan makes it clear that it will supersede the Core Strategy. References are made to the Core Strategy as it often provides the context for the policy in question.	No
LPS429	Introduction and background	1	Mr	Cheadle Unite	Residents frequently express concern about the ethics and accountability of the Executive at SMDC, and a number of key		No	No	No	Matters raised do not relate to the soundness or legal compliance of the plan.	No

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			Greg Powell		councillors. Cheadle Unite list a number of examples.						
LPS501	Introduction and background	1	Mr Anthony Holt		Respondent objects to the Local Plan. They consider the Plan non-compliant with the Churnet Valley Masterplan, Neighbourhood Plans and the adopted Core Strategy. Additionally, they do not support the lack of constraint on future developments in towns and villages, as well as the fact residents objections keep being ignored.			No	No	Policy SS11 is largely the same as the approach to the Churnet Valley as the adopted Core Strategy. The policy provides a clear link to the Churnet Valley Masterplan. The Local Plan clearly identifies the strategic policies that emerging neighbourhood plans must be in general conformity with in order to assist their preparation.	No
LPS498	Introduction and background	1	G Ellis		Respondent feels the public have been ignored by the Council.					The Local Plan has been subject to extensive consultation which has shaped the plan as set out in the Consultation Statement.	No
LPS370	Paragraph	1.1	Mr Martin Webb		Respondent considers that the plan period should be extended by at least 4 years (i.e. 2035) to ensure that it plans for a full 15 year horizon on adoption. The respondent argues the earliest the plan could possibly be adopted is Spring 2019. Given that the end date of the plan is March 2031, it would only plan for 12 years or less from adoption, and not the 15 year horizon preferred by the Framework.			No	No	The plan period is that set out in the Inspector's report regarding the Core Strategy in which the need for an early plan review was set out for the period 2016-2031. The NPPF states that plans should "preferably" follow a 15-year time horizon.	No
LPS389	Paragraph	1.1	Wainhomes (North West) Limited		Respondent considers that the plan period should be extended by at least 4 years (i.e. 2035) to ensure that it plans for a full 15 year horizon on adoption. The respondent argues the earliest the plan could possibly be adopted is Spring 2019. Given that the end date of the plan is March 2031, it would only plan for 12 years or less from adoption, and not the 15 year horizon preferred by the Framework.			No	No	The plan period is that set out in the Inspector's report regarding the Core Strategy in which the need for an early plan review was set out for the period 2016-2031. The NPPF states that plans should "preferably" follow a 15-year time horizon.	No
LPS1	Paragraph	1.2	Mr Robert Moseley		The land at Wharf Road was added to the Plan after the initial consultations. Respondent states that this does not feel like full co-operation. People's views and objections against development to the west of the disused railway were not considered. Furthermore, developing the land to the west of the disused railway is not in line with Green Belt policy. There are brownfield sites that could be developed instead.		No	Yes	Yes	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW (the Green Belt part of the Wharf Road Strategic Development Area - west of the Biddulph Valley Way) was suggested for consideration as part of the Preferred Sites and Boundaries Consultation in 2016. The site was then investigated by the Council to determine whether any constraints existed which made the site unsuitable for inclusion in the Local Plan. For example – Green Belt Review, county highways, land availability, impact on utilities, crossing the Biddulph Valley Way. Once the screening had taken place and it was determined that there were no known factors precluding the inclusion of the site, it was included in the consultation at Preferred Options Stage in 2017. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at	No

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										<p>20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. The Core Strategy also acknowledged that some Green Belt release would be necessary to enable sufficient housing growth in Biddulph.</p> <p>The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>The Council's Green Belt Review concludes that BDNEW could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating specifically to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p> <p>Other sites, including brown field sites have been considered as part of previous consultations. Allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.</p> <p>In determining which sites should be included in the Local Plan, the Council must balance Government planning policy, relevant evidence <i>and</i> public opinion.</p>	
LPS67	Paragraph	1.2	Mr Robert James Piers-Leake		<p>Abbot's Haye on Cherry Lane is a quality country house and has been since December 1999. Respondent has, in the past, made what might be regarded as half-hearted approaches to SMDC, regarding two of their six acres of land, of which they would like to obtain planning permission. The revenue from the development of their two acres of land would be used to bring Abbot's Haye up to scratch, enabling it to provide quality guest house accommodation well into the future.</p> <p>A similar approach was allowed in the past with Woodhead Hall. Although, unlike Woodhead Hall, Abbot's Haye is not listed, respondent would like to be considered in the same way. Any development would be shaped to hopefully fall in line with what is most needed in the area, but ideally in line with the quality of the development associated with Woodhead Hall. However, even though development was allowed for the benefit of Woodhead Hall, like Abbot's Haye it is not in any of the allocated development areas.</p> <p>Respondent requests that the Local Plan be amended to include their two acres of land, bounding Cherry Lane, so that Abbot's Haye may be improved for the benefit of the local economy and</p>	The two acres of land available at Abbot's Haye should be included within the Plan, for development.	No			<p>Abbot's Haye is outside the settlement boundary and remote from main urban area. It is identified in the Landscape & Settlement Character Assessment as forming part of remnant historic landscape and there is a potential impact on setting of adjacent Hales Hall listed building.</p> <p>The site is not considered suitable as a housing allocation in the Local Plan.</p>	No

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					its future. Respondent would appreciate being informed whether this is the correct place to raise their concern, with an eye to any dates which would hinder their progress with the proposed development and associated upgrade of Abbot's Haye.						
LPS47	Paragraph	1.6	Mr David Fowler		Respondent feels that the consultations which have been conducted to achieve this Plan have been confusing and bogus.			No	No	The Local Plan has been subject to extensive consultation as set out in the consultation statement.	No
LPS46	Paragraph	1.27	Mr David Fowler		Respondent objects to the Local Plan on the grounds that it is neither sound nor lacks legal compliance. No specific reason is given why.			No	No	The Local Plan is considered to be sound and legally compliant by the Council.	No
LPS107	Paragraph	1.27	Mrs MELANIE THOMAS		<p>The Plan does not pass the "test of soundness" with regard to Site EN128 because the site has not been objectively assessed. Furthermore, the Plan is not 'justified' because reasonable alternatives to Site EN128 have been proposed by the Parish Council and supported by local residents. These reasonable alternatives are based on up-to-date evidence and experiences of people who know the area best. The Parish Council have suggested that rather than consolidating development in one site, smaller scale developments in several parts of the village (Endon) would minimise any impact on local residents.</p> <p>Considering the number of single dwellings built in the gardens of existing homes in Endon over the past 10 years, it is reasonable to assume that this trend would continue during the remaining lifetime of the Plan (2019-2031). At the rate of 2+ properties a year in Endon, this option for development would deliver the 22 additional homes required in the village, without resulting in the loss of one of the last remaining open spaces.</p>	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No	<p>The Council maintains a housing suggestions database (Strategic Housing Land Availability Assessment or 'SHLAA'); which formed the basis of the Council's 2015 Site Options public consultation. This mapped all housing sites on the database that were deemed broadly suitable and in the case of villages had a housing capacity of 5+ dwellings. This and later consultations also invited alternative suggestions for housing sites. The options sites assessments following the '2015 Options' public consultation provided a broadbrush red/amber/green comparison between the various options sites; and was used to assist the Council in arriving at the 2016 'Preferred Options'. The 2016 Preferred Options formed the basis of the 2017 Preferred Options Local Plan. The Council has considered the alternative sites suggested in the responses to previous consultations and where appropriate has included the additional sites in the proposed site allocations in the emerging Local Plan. The Council publishes its responses to representations received at each round of public consultation on its website.</p> <p>The submission version Local Plan sets out a residual housing requirement to 2031 for the rural areas as a whole, in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. These requirements do not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too – the Policy factors in assumptions about future infill housing across rural areas which reflects past trends (resulting in a lower residual requirement). This would include sites in/around Endon proposed for development not formally identified on the Endon map.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to</p>	No	

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										<p>determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p> <p>The Green Belt Review Study 2015 (as updated Sept 2016) provides a strategic review of Green Belt purposes and a more detailed site-based assessment of land which could be considered for review. The review found that:</p> <ul style="list-style-type: none"> Land at Endon Bank Farm, Endon - could be considered for release from Green Belt under Exceptional Circumstances reflecting the site's size and generally enclosed character and relationship with the current built edge of Endon, although the absence of a clear development boundary to the northeast and northwest is problematic. Extension of the village boundary would act to contain further potential development. Land adjacent to the A53 Leek Road, next to Greenmeadow Grove, Endon- could be considered for release from Green Belt under Exceptional Circumstances reflecting the site's size and generally enclosed character and relationship with the current built edge of Endon, although the absence of a clear development boundary to the northeast is problematic. Extend proposed village boundary. Land parcel 'N23' [encompassing EN092+ EN108] overall made a 'contribution' to the purposes of Green Belt, as the open, sparsely settled character makes them particularly vulnerable to the effects of urbanisation. 	
LPS153	Paragraph	1.27	Mr Kevin Thomas		<p>The Plan does not pass the "test of soundness" with regard to Site EN128 because the site has not been objectively assessed. Furthermore, the Plan is not 'justified' because reasonable alternatives to Site EN128 have been proposed by the Parish Council and supported by local residents. These reasonable alternatives are based on up-to-date evidence and experiences of people who know the area best. The Parish Council have suggested that rather than consolidating development in one site, smaller scale developments in several parts of the village (Endon) would minimise any impact on local residents.</p>	<p>Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.</p>		No		<p>The Council maintains a housing suggestions database (Strategic Housing Land Availability Assessment or 'SHLAA'); which formed the basis of the Council's 2015 Site Options public consultation. This mapped all housing sites on the database that were deemed broadly suitable and in the case of villages had a housing capacity of 5+ dwellings. This and later consultations also invited alternative suggestions for housing sites. The options sites assessments following the '2015 Options' public consultation provided a broadbrush red/amber/green comparison between the various options sites; and was used to assist the Council in arriving at the 2016 'Preferred Options'. The 2016 Preferred Options formed the basis of the 2017 Preferred Options Local Plan. The Council has considered the alternative sites suggested in the responses to previous consultations and where appropriate has included the additional sites in the proposed site allocations in the emerging Local Plan. The Council publishes its responses to representations received at each round of public consultation on its website.</p>	No

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										<p>The submission version Local Plan sets out a residual housing requirement to 2031 for the rural areas as a whole, in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. These requirements do not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too – the Policy factors in assumptions about future infill housing across rural areas which reflects past trends (resulting in a lower residual requirement). This would include sites in/around Endon proposed for development not formally identified on the Endon map.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p> <p>The Green Belt Review Study 2015 (as updated Sept 2016) provides a strategic review of Green Belt purposes and a more detailed site-based assessment of land which could be considered for review. The review found that:</p> <ul style="list-style-type: none"> • Land at Endon Bank Farm, Endon - could be considered for release from Green Belt under Exceptional Circumstances reflecting the site's size and generally enclosed character and relationship with the current built edge of Endon, although the absence of a clear development boundary to the northeast and northwest is problematic. Extension of the village boundary would act to contain further potential development. • Land adjacent to the A53 Leek Road, next to Greenmeadow Grove, Endon- could be considered for release from Green Belt under Exceptional Circumstances reflecting the site's size and generally enclosed character and relationship with the current built edge of Endon, although the absence of a clear development boundary to the northeast is problematic. Extend proposed village boundary. • Land parcel 'N23' [encompassing EN092+ EN108] overall made a 'contribution' to the purposes of Green Belt, as the open, sparsely settled character makes them particularly vulnerable to the effects of 	

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										urbanisation.	
LPS273	Paragraph	1.27	Ms K Dewey	Staffordshire Wildlife Trust	<p>The Staffordshire Wildlife Trust are concerned that the Plan does not comply with the NPPF and the PPG, making specific reference to Paragraphs 110 and 117 of the NPPF. Their concerns are as follows:</p> <ul style="list-style-type: none"> A number of designated Local Wildlife Sites have been allocated for development, which is contrary to the guidance that plans should allocate land with the least environmental value. For example, Birchall Meadow Biodiversity Alert Site (within LE235 Cornhill East Proposed Mixed Use Allocation) and Twinney Wood and Grassland SBI (within LEEK EM2 Proposed Employment Allocation). Surveys by ECUS in 2017 considered over 30 sites / features “with habitat potentially suitable for SBI or BAS designation” against the Staffordshire Local Wildlife Sites criteria. However, there is no evidence to show how these areas were assessed or the results data. Data on sites that were deemed to meet the criteria were not provided to the Staffordshire LWS Grading partnership for verification or designation. As such, there was not enough evidence to identify and map the location and extent of locally designated sites. The ECUS studies have also not correctly identified the proximity to some Local Wildlife Sites. It appears that central grid references for LWS may have been used, rather than being measured on a map. For example, Site ADD09 in Leekbrook is directly adjacent to Cheddleton Heath LWS, but the ecology report states that it is 1.82km to the west. This means that potential impacts to Local Wildlife Sites from adjacent allocations have not been recognised. The national inventory of Ancient Woodland is not comprehensive, and many woodlands under 2 hectares in size have not yet been identified. Small areas of ancient woodland are identified and added to the inventory every year, and are often found near to existing ancient woodlands. Checking old maps and undertaking surveys on the ground are some of the methods. The Staffordshire Wildlife Trust are concerned that such assessments have not been undertaken on/near allocation sites or to inform the Green Infrastructure Strategy. While broad corridors have been identified in the Green Infrastructure Strategy, the smaller-scale corridor features that may be impacted, affected or enhanced by site allocations are not clearly shown. <p>In conclusion, it is not clear how the Plan has identified suitable indicators for monitoring biodiversity in the Plan.</p>			Yes		<p>The Local Plan as a whole has been prepared with the aim of minimising adverse effects on the natural environment; and has been informed by an SA which assessed the sustainability effects on not only proposed allocation sites, but also reasonable alternative site options. The Council’s Extended Phase I and LWS survey evidence set out recommended further surveys/actions for allocated sites that the Council would expect developers to take account of, which is reflected in site-specific policies. In any event Natural Environment Policy NE1 requires schemes to demonstrate (on- or off-site) net gains in biodiversity where appropriate; ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Also note part (6) expects biodiversity enhancements to be conducted in line with the Staffordshire Moorlands Biodiversity Opportunity Map and Staffordshire Biodiversity Action Plan. Further Policy NE2 (“Trees Woodlands and Hedgerows”) protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>In the case of allocations DSL4 (Cornhill East) and DSR2 (Land east of Brooklands Way, Leekbrook) the site-specific policies recognise the presence of on-site nature conservation designations and address this by requiring appropriate ecological mitigation/compensation. DSL4 is also a brownfield site as supported in NPPF. The Council must consider a range of factors/evidence when it considers the most appropriate sites to be allocated.</p> <p>The Council’s emerging Green Infrastructure Strategy for the District which has been developed in conjunction with the emerging Local Plan, maps the hierarchy of nature conservation sites within and adjacent to the District. The GIS seeks to link existing green spaces with District-wide green corridors, which has ecological and other benefits. Nature conservation and geological designations can also be viewed on the Council’s interactive planning map on its website. Also the Council supports Parishes seeking to implement Neighbourhood Plans; this would include encouragement of local-level mapping/recording of local green features.</p> <p>Current County SER online records can be viewed in light of the Council’s more recent LWS evidence for the District (with individual records mapped in the studies). This summary evidence has been prepared by members of CIEEM and utilised SER, NBN and MAGIC records in the first instance. It is understood that the consultant holds field data in relation to this project which may be available on request. Individual records discuss the proximity to existing nature conservation sites, and the presence of section 41 habitats/species. The results of the LWS evidence are set out on the Council website</p>	No

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										<p>which can be viewed by the grading committee/other interested parties. The consultant was instructed to undertake full scrutinisation against local SBI criteria. The Council's (ecological) evidence base should be proportionate: the LWS work utilised the results of the 2015 Lockwood Hall Phase I studies, and given the large number of sites it was the consultant's discretion whether certain sites warranted further assessment including site visits. The approach adopted by the consultants with respect to LWS assessment, including the consideration of nature designations in proximity, is set out in the 'Methodology' sections in the August 2017, November 2017 reports. Note that a number of the LWS assessment sites also involved on-site Phase I survey. The studies may also have limitations regarding the time of year the assessments took place regarding the surveying of different species or habitats. Aside from sites LE235 and LEEK EM2 (DSL4 and DSR2) the Council is not aware of any other candidate LWSs. The Council would expect all developers to adhere to the recommended surveys/actions of each site record.</p> <p>The Council must ensure it holds a proportionate evidence base to justify its Local Plan. Note Policy NE2 protects existing AW areas where affected by development, and developers would need to address the requirements of that policy, including submission of appropriate reports at application stage. Existing areas of AW can be viewed on the Council's interactive planning map.</p> <p>The monitoring indicators pertaining to policies NE1 and NE2 are set out in Section 10 Table 10.2 of the Local Plan. These were selected as they were, collectively considered a reasonable number of reasonable measures of biodiversity change, with the information being readily available to the Council.</p>	
LPS328	Paragraph	1.30	Mr Gez Willard	Willardwillard Ltd	The need to make adequate policy and site allocation provision for self build and custom build housing is noted and supported.					Comments noted.	No
LPS196	Paragraph	1.35	Mrs C Burton		The development of Site EN128 is not in accordance with bullets 1 (children and young people) and 3 (older people and adults at risk of exclusion) of this paragraph, making the Plan unsound.			No		<p>The Council has regard to its Sustainable Community Strategy during the preparation of the Local Plan.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p>	No

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LPS208	Paragraph	1.35	Mr R Burton		This paragraph refers to a long-term vision and plan but provides no clear details of its intentions. Saying that "children and young people" and "older people and adults at risk of exclusion" are key outcomes is meaningless, unless SMDC has a hidden agenda for family planning and the Plan is deliberately intended to provide a risk of exclusion for the elderly!			No		The Council has regard to its Sustainable Community Strategy during the preparation of the Local Plan. The Introduction to the Local Plan provides a summary of the policy context. The Sustainable Community Strategy can be viewed in its entirety on the Council's website at https://www.staffs Moorlands.gov.uk/article/1371/Sustainable-community-strategies .	No
LPS197	Paragraph	1.38	Mrs C Burton		Aims 1 and 4 of the Corporate Plan cannot be achieved by developing Site EN128. The development will not create a safer and healthier environment because it will result in the loss of the community's last piece of green space. People's quality of life will not be improved by building high density housing and adding more cars to the roads. The car parking at school times in Brookfield Avenue is chaotic and dangerous, and affects residents' wellbeing.			No		The Council has regard to its Corporate Plan during the preparation of the Local Plan. The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good. The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. The site is within the village boundary and is therefore considered suitable as a potential housing option. Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.	No
LPS108	Paragraph	1.39	Mrs MELANIE THOMAS		Development of Site EN128 will not achieve any of the aims of the Council's Corporate Plan and will in fact be detrimental to the immediate vicinity of the area and the wider community. The current landowner has sought to enclose what was a designated Visual Open Space by growing hedges (and erecting a 2m high fence on the boundary of the site adjacent to rear gardens on Brookfield Avenue) to block views from Stoney Lane across the site, into St Luke's playing field and towards Stanley. These measures are reversible and the openness of this green	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS. The site is within the village boundary and is therefore considered suitable as a potential housing option.	No

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					<p>space could be quickly restored for the future benefit of the community. Sound arguments presented by local residents which led to the Planning Inspector to acknowledge the value of this site as a Visual Open Space in 1996/97 and refuse planning permission, are still valid today. The meadow offers a natural break in development and borders an ancient bridleway (Stoney Lane) which has characterful, mature and generous sized properties on large plots. The environment has a semi-rural nature, is tranquil with virtually no light or noise pollution and attracts a variety of wildlife and birds. The respondent (whose garden backs onto Site EN128) enjoys listening to birdsong and woodpeckers, and watching squirrels. Furthermore, the pupils at St Luke's have benefited from the natural habitat of this meadow, which has bordered their school playing field since 1963.</p>					<p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	
LPS154	Paragraph	1.39	Mr Kevin Thomas		<p>Development of Site EN128 will not achieve any of the aims of the Council's Corporate Plan and will in fact be detrimental to the immediate vicinity of the area and the wider community.</p> <p>The current landowner has sought to enclose what was a designated Visual Open Space by growing hedges (and erecting a 2m high fence on the boundary of the site adjacent to rear gardens on Brookfield Avenue) to block views from Stoney Lane across the site, into St Luke's playing field and towards Stanley. These measures are reversible and the openness of this green space could be quickly restored for the future benefit of the community. Sound arguments presented by local residents which led to the Planning Inspector to acknowledge the value of this site as a Visual Open Space in 1996/97 and refuse planning</p>	<p>Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.</p>		No		<p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its</p>	No

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					<p>permission, are still valid today. The meadow offers a natural break in development and borders an ancient bridleway (Stoney Lane) which has characterful, mature and generous sized properties on large plots. The environment has a semi-rural nature, is tranquil with virtually no light or noise pollution and attracts a variety of wildlife and birds. The respondent (whose garden backs onto Site EN128) enjoys listening to birdsong and woodpeckers, and watching squirrels. Furthermore, the pupils at St Luke's have benefited from the natural habitat of this meadow, which has bordered their school playing field since 1963.</p>					<p>selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	
LPS204	Paragraph	1.39	Mr R Burton		<p>Aims 1 and 4 of the Corporate Plan will not be achieved by building 22 additional houses in Site EN128. Site EN128 should not be developed for the following reasons:</p> <ul style="list-style-type: none"> • Brookfield Avenue already carries a large volume of traffic serving its own properties and accessing those in adjoining roads. The 22 new homes will bring additional cars to the area. This will not help create a healthy environment due to increased noise and exhaust fumes. • Access is identified on the map as being at the corner of Brookfield Avenue and Stoney Lane. Yet a planning application to build one dwelling at the corner of this junction (also shared by Hazelwood Road and an access road to further dwellings) was recently turned down. • Increased traffic will not help to create a safer environment. Parking is an ongoing concern in Brookfield Avenue, especially during school times. Parking restrictions at these times are largely ignored 			No		<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and</p>	No

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					<p>and rarely patrolled or enforced. Cars frequently drive on the pavement to pass while schoolchildren are using it. Other cars park on the pavements causing pedestrians with pushchairs to do into the roadway. Additional traffic generated by the proposed development at EN128 will not increase safety despite aspirations of the Local Plan.</p> <ul style="list-style-type: none"> Site EN128 is adjacent to a primary school playing field where young children have sports lessons and spend their playtimes. For the school to be overlooked by the proposed houses immediately raises questions about safeguarding. Dollisfield (Site EN128) is a natural habitat and open space located in a congested area. To replace it with a concentration of housing will not achieve either Aim 1 or Aim 4 of the Council's Corporate Plan. 					<p>residential amenity.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside." The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	
LPS41	Paragraph	1.42	Mr Paul Bain		<p>The respondent requests the LPA to demonstrate how they have complied with their duty to co-operate with respect to:</p> <ul style="list-style-type: none"> Footpaths – what safety risk assessment has been carried out with the SCC roads authority to identify a lack of existing footpath resulting in a high risk of accident/fatality. These safety risk areas should be identified within the Plan, with controls identified and upgraded within the delivery period. 5 Ends junction – what safety risk assessment has been carried out with the SCC roads authority to identify road infrastructure risks around Alton, including 5 Ends. These risk should be identified within the Plan, with controls identified and upgraded within the delivery period. Alton Towers – what safety risk assessment has been carried out with the Alton Towers Resort Transport Liaison Group to identify road infrastructure to and from Alton Towers that possess a high safety risk to road users. These sections of inadequate infrastructure should be identified within the Plan, with controls agreed and upgrading within the delivery period. Parish boundaries – what investigations/studies with Historic England have taken place, and whether historical literature and ordnance survey maps have been investigated to establish the correct boundaries of 		No	No	No	<p>The Local Plan has complied with the duty to co-operate as set out in the Duty to Co-operate Statement. In terms of highway safety, the highways authority has been fully engaged with the selection of sites and supporting policies to ensure that the relevant issues are addressed.</p> <p>The Local Plan cannot alter a parish boundary. Amendments to planning boundaries are proposed to reflect planning issues only such as the scope for infill plots and settlement edge.</p>	No

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					Alton village.						
LPS212	Paragraph	1.42	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) have been working closely with SMDC on the Plan since its inception and will continue to do so through its delivery. The outcome of this joint working is that SCC are in a position to be broadly supportive of the Plan.					Support noted.	No
LPS359	Paragraph	1.42	Mr Paul Hill	RPS Planning & Development	The general approach to the Duty to Co-operate is supported. However, the respective Plans of Stoke-on-Trent City Council, Newcastle-Under-Lyme Borough Council and Staffordshire Moorlands District Council (SMDC) are not aligned. The table (pages 18-19) indicates that Stoke has not been able to assist SMDC in meeting its housing development requirements. Yet there is no evidence to demonstrate that SMDC is unable to meet its own housing requirement. The table does not show the potential need for SMDC to accommodate some of Stoke's future development and there is no evidence that such discussions have taken place. Given that the housing and employment requirements for Stoke are not yet established and that Stoke has a very tight administrative boundary, Staffordshire Moorlands Local Plan should include a review trigger policy to require the Plan to be reviewed, should there be a requirement for the Plan to accommodate any unmet need arising from Stoke.	The Local Plan should include a review trigger policy that requires the Plan to be reviewed, should there be a requirement for the Plan to accommodate any unmet need arising from Stoke.	No	No		The Stoke and Newcastle SHMA concluded that the plan area was a self contained housing market area albeit with connections to the Moorlands. The Staffordshire Moorlands SHMA also identified relations with the Stoke/Newcastle area and to a lesser extent Stafford Borough in particular wards. The Council has engaged with Stoke-on-Trent City Council and others during the preparation of the plan under the Duty to Co-operate to address strategic matters. This has included the scope for housing provision to be made in the emerging joint Stoke and Newcastle Local Plan and Stafford Borough towards the housing needs for the District. The City Council, Newcastle-under-Lyme Borough Council and Stafford Borough Council have confirmed that they are currently unable to agree to any additional housing to be accommodated in their plan areas. The recent Preferred Options consultation published by Stoke and Newcastle identified sufficient land to accommodate Stoke's housing needs but there was a deficit in Newcastle and therefore that plan area as a whole. The authorities are committed to continued engagement to inform plan making.	No
LPS424	Paragraph	1.42	Mr Greg Powell	Cheadle Unite	Cheadle Unite have asked SMDC for over 7 years to work closely with Stoke-on-Trent on the regeneration of brownfield sites where infrastructure has been proven to exist and where affordable housing can be built for the younger generation. SMDC should set an overall figure with Stoke-on-Trent and the Potteries that reduces SMDC's allocation in a win-win collaboration. Stoke-on-Trent have already acknowledged in writing that development opportunities outside the regeneration areas draws developers away, creating uncertainty that discourages occupancy. Cheadle residents want the their allocation reduced, and provision for this can exist under a Duty to Co-operate (this is a reference from 7.41 in the 02/03/2016 SMDC document). The residents of Cheadle are looking forward to working alongside Stoke-on-Trent and Emma Bridgewater (President of the Campaign to Protect Rural England) who is driving an initiative to regenerate brownfield sites around the potteries. Yet residents have not yet seen anything to reflect this co-operation.	SMDC need to work collaboratively with Stoke-on-Trent on the regeneration of many of the brownfield sites around the Potteries where proven infrastructure exists.	No	No	No	The presumption in favour of sustainable development in the NPPF makes it clear that the Local Plan should meet the objectively assessed need for housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the NPPF indicate that development should be restricted. The Local Plan seeks to provide 320 homes per year which is toward the top of the range of the objectively assessed need for housing as the Council considers there to be a sufficient supply of suitable sites for this and it is keen to ensure that sufficient housing is provided to support economic growth and affordable housing delivery in the District. The Council has engaged with Stoke-on-Trent City Council and others during the preparation of the plan under the Duty to Co-operate to address strategic matters. This has included the scope for housing provision to be made in the emerging joint	No

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										Stoke and Newcastle Local Plan towards the housing needs for the District. The City Council and Newcastle-under-Lyme Borough Council have confirmed that they are currently unable to agree to any additional housing to be accommodated in their plan area.	
LPS436	Paragraph	1.42	Richard House	Gladman	Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities on how best to address the remainder (Paras 1.2 and 1.9 of the Government White Paper). However, there is no evidence that Staffordshire Moorlands has worked with neighbouring authorities to ensure that the housing requirement is met in full.	To explain their concerns to the Inspector.				The Local Plan seeks to provide 320 homes per year which is toward the top of the range of the objectively assessed need for housing as the Council considers there to be a sufficient supply of suitable sites for this and it is keen to ensure that sufficient housing is provided to support economic growth and affordable housing delivery in the District. The Council has engaged with Stoke-on-Trent City Council and others during the preparation of the plan under the Duty to Co-operate to address strategic matters. This has included the scope for housing provision to be made in the emerging joint Stoke and Newcastle Local Plan and Stafford Borough towards the housing needs for the District. The City Council, Newcastle-under-Lyme Borough Council and Stafford Borough Council have confirmed that they are currently unable to agree to any additional housing to be accommodated in their plan areas.	No
LPS26	Paragraph	1.45	Mr Ian Fullilove	Policy Planner Peak District National Park Authority	The Peak District National Park Authority welcome this paragraph.					Support noted.	No
LPS16	Paragraph	1.46	Mr Paul Bain		<p>Additional information added to this representation was received on 1st April 2018.</p> <p>The respondent does not feel the LPA has complied with the Duty to Co-operate, with regard to the following:</p> <ul style="list-style-type: none"> No safety risk assessments have been carried out with Staffordshire County Council on the footpaths within Staffordshire Moorlands, which identify the lack of existing footpath. No safety risk assessments have been carried out on the road infrastructure with Staffordshire County Council Highways Authority, for example the junction known as 'S Ends'. No safety risk assessment has been carried out with the Alton Towers Resort Transport Liaison Group, on road infrastructure. No investigations/studies have been conducted with Historic England, to establish the correct boundaries of Alton Village. 		No	No	No	<p>Councils are under obligation to prepare and update Local Plans for their areas; and as a policy requirement to demonstrate how their Plans meet their objectively assessed needs for future housing and other forms of development. Plans should be based on proportionate and relevant evidence base concerning the environmental etc characteristics of their area. Policies should cover future transport infrastructure requirements, and Plans should avoid significant adverse environmental impacts. The Council's website sets out a number of development capacity and transportation studies, and infrastructure delivery plan, which have been taken into account in the preparation of the submission Local Plan. Note that Local Plan Policies and objectives seek to direct more sustainable patterns of travel such as walking and cycling over car use.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC have not objected to the allocations contained in the submission Local Plan (including Alton AL012), recommending in some cases that transport assessments be submitted with future schemes at some sites; and planning contributions may be required in some cases. The Council's own Policy T1 Development and Sustainable Transport sets out the circumstances where developers must contribute to eg improved highways infrastructure. The Government's National Planning Policy Framework however explains that schemes should only be prevented or refused on transport grounds where the residual cumulative impacts of development</p>	No

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										<p>are severe.</p> <p>Note that footpath and highways maintenance remains a duty of the County Council, not Staffordshire Moorlands District Council. SCC's local priorities with regards highways works are set out in its Integrated Transport Strategy for the Staffordshire Moorlands.</p> <p>Note that the Council has published its Duty to Cooperate Statement on its website, which provides an overview of how the Council has met its obligations under Duty to Cooperate. It provides details of strategic cooperation matters and partnership working with relevant bodies including neighbouring authorities, that have shaped the Local Plan and will assist in its delivery.</p> <p>Currently adopted village boundaries (including Alton) are set out in the 1998 Local Plan Policies maps (on the Council website). The emerging Local Plan proposes (in some cases amended) settlement boundaries which will replace these. Although the Council consults with Historic England generally during Local Plan preparation the existence/extent of village boundaries are the responsibility of the local planning authority to prepare for Examination, not Historic England.</p>	
LPS90	Paragraph	1.48	Roslyn Deeming (Natural England)	Natural England	Natural England have reviewed the Habitats Regulations Assessment (HRA) and note that their previous advice which highlighted the need to assess in-combination effects <i>has</i> been carried out and included within the Plan. Natural England 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.		Yes	Yes	Yes	Support noted.	No
LPS27	A Portrait of Staffordshire Moorlands	3	Mr Ian Fullilove	Policy Planner Peak District National Park Authority	Co-operation means recognising the planning context for the plan area and in this case, the relationship with the Peak District National Park. It is therefore essential that it is clear what geographical area the Plan covers (as distinct from the whole District). While it is understood why the Council wants to show the whole area, it can be misleading to people looking to apply policies from the Plan.	The map could usefully show the boundary of the Peak District National Park Authority so that readers of the Plan are aware that some parts of the District are overseen for planning purposes by the Peak District National Park Authority.	No			Amend map to show Peak District National Park boundary	Yes
LPS198	Paragraph	3.18	Mrs C Burton		The first sentence in this paragraph is a good aim. However, it cannot be achieved by developing housing on Site EN128.			No		<p>Note EN128 lies within the Endon settlement boundary therefore does not lie within the countryside.</p> <p>New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p>	No
LPS109	The Challenges	4	Mrs MELANIE THOMAS		With regard to the first and third bullet points in the 'Creating healthy, sustainable communities' box, there is inadequate infrastructure to support the increased demand that would result from the development of Site EN128. There is only one GP Surgery in the village of Endon that has offered reduced service provision in the last 18 months to the detriment of Endon	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the		No		New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.	No

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					patients. Furthermore, all three schools in the village are oversubscribed and could not provide the required number of places. Indeed two of the three schools have no capacity to extend their premises.	village.				<p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	
LPS110	The Challenges	4	Mrs MELANIE THOMAS		With regard to the 'Tackling climate change' box, the area surrounding Site EN128 has flooding problems. Brookfield Avenue is at the bottom of a hill and during periods of heavy rainfall the water runs down from the fields above, carrying debris. The parish Council is aware that the drainage system is inadequate to cope with existing demand. St Luke's playing field is also below the level of Site EN128 and in recent years has become increasingly boggy due to water running off Dollisfield onto the school site. Heavy rainfall has also caused the level of the brook (which sits on the boundary between Ste EN128 and the rear gardens of Brookfield Avenue) to become extremely high. Lastly, following the construction of a new house at the top of Brookfield Avenue, there has been an increase in flooding problems down the full length of the road. Any further development would serve to seriously increase the risk of flooding in an area which has inadequate infrastructure.	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		<p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	No
LPS155	The Challenges	4	Mr		With regard to the first and third bullet points in the 'Creating healthy, sustainable communities' box, there is inadequate	Site EN128 should be removed from the Plan and		No		New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support	No

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			Kevin Thomas		infrastructure to support the increased demand that would result from the development of Site EN128. There is only one GP Surgery in the village of Endon that has offered reduced service provision in the last 18 months to the detriment of Endon patients. Furthermore, all three schools in the village are oversubscribed and could not provide the required number of places. Indeed two of the three schools have no capacity to extend their premises.	alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.				<p>more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	
LPS156	The Challenges	4	Mr Kevin Thomas		With regard to the 'Tackling climate change' box, the area surrounding Site EN128 has flooding problems. Brookfield Avenue is at the bottom of a hill and during periods of heavy rainfall the water runs down from the fields above, carrying debris. The parish Council is aware that the drainage system is inadequate to cope with existing demand. St Luke's playing field is also below the level of Site EN128 and in recent years has become increasingly boggy due to water running off Dollisfield onto the school site. Heavy rainfall has also caused the level of the brook (which sits on the boundary between Ste EN128 and the rear gardens of Brookfield Avenue) to become extremely high. Lastly, following the construction of a new house at the top of Brookfield Avenue, there has been an increase in flooding problems down the full length of the road. Any further development would serve to seriously increase the risk of flooding in an area which has inadequate infrastructure.	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		<p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be</p>	No

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										assessed against para 89 NPPF etc.	
LPS199	The Challenges	4	Mrs C Burton		With regard to the 'Tackling climate change' box (bullet point 4), Endon has a high flood risk. As such, Site EN128 should not be developed.			No		The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.	No
LPS206	The Challenges	4	Mr R Burton		With regard to the 'Creating healthy, sustainable communities' box, the surgeries and schools in Endon are already oversubscribed. Does the District have the authority to provide extra capacity and make improvements to either system, and if it does would it have the necessary financial resources?			No		The plan has been informed by contained engagement with infrastructure providers including Staffordshire County Council in relation to education and other matters. The Local Plan and Infrastructure Delivery Plan make provision for the delivery of required infrastructure.	No
LPS207	The Challenges	4	Mr R Burton		With regard to the 'Tackling climate change' box, Endon is susceptible to flooding (a Flood Action Group exists in the village). A number of watercourses exist in the area of Dollisfield which itself provides natural drainage. Several of these watercourses pass through culverts which, according to Paragraph 8.24 are not recommended as they can impede water flow and worsen flooding, at the same time as impacting on the ecological health of the watercourse.			No		The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act. Comments noted. Note that Local Plan Policy SD5 on flood risk, expects wherever possible, development to open up any culverted watercourses on site to increase flood water storage and create a green corridor. Also the additional culverting of watercourses will not normally be permitted.	No
LPS209	The Challenges	4	Mr R Burton		With regard to the 'Making travel more sustainable' box, reference is made to addressing poor public transport particularly in Rural Areas. However, in recent weeks a review has been undertaken on bus services in the Moorlands with subsidies cut and services reduced. This contradicts the Plan.			No		The Local Plan cannot determine bus subsidies. However, the Spatial Strategy seeks to ensure that development is brought forward in sustainable locations. Policies also seek contributions towards supporting infrastructure where appropriate.	No
LPS163	The Vision	5	Mr Yendole	Forward Planning Stafford Borough Council	Stafford Borough Council are generally supportive of the Vision. Stafford Borough Council also welcome the opportunity to enter into a Statement of Common Ground with SMDC for submission of the Local Plan.					Support noted.	No
LPS267	The Vision	5	Ollerton Estates LLP and Staffordshire County Council (SCC)		The Vision for Leek is supported by the landowners of LE066, LE128a&b and LE140.			Yes		Support noted.	No
LPS350	The Vision	5	Mr Paul Hill	RPS Planning & Development	RPS support the vision for Cheadle, which recognises the town as a significant service centre which will be a focus for growth in housing and employment. However, the visions for each of the three towns could place greater emphasis on concentrating growth at these locations (see Comment LPS352).			No		The Local Plan, including Policy SS4, already makes it clear that 75% of planned growth will be concentrated in the main towns.	No
LPS353	The Vision	5	Mr	RPS Planning	The Vision is supported. However, clarity should be provided on			No		The Vision and Local Plan as a whole set out that the towns will	No

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			Paul Hill	& Development	what is meant by the market towns being a focus of the Moorlands.					support the majority of planned growth and will continue to provide a range of shops, services and facilities to serve the wider District.	
LPS536	The Vision	5	Muller Property Group		The respondent reiterates their support for the 'Vision for Cheadle', in particular the provision of housing to the north and south of the town.					Support noted.	No
LPS184	Paragraph	5.2	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	<p>United Utilities wishes to highlight that they will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. New development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions throughout the development of the Local Plan.</p> <p>United Utilities request that the Council continues to consult with them for all future planning documents. They are keen to continue working in partnership with Staffordshire Moorlands District Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with the Council's delivery targets.</p>				Comments noted.	No	
LPS120	Paragraph	5.3	Mr T A J Campbell		The Visino for Cheadle is supported in principle, particularly the aim of creating a development cluster to the south of the town as a means of addressing the ongoing chronic shortfall in housing provision in the town.	Respondent does not offer any modifications for the Local Plan.	Yes	Yes	Yes	Support noted.	No
LPS15	Aims and Objectives	6	Mr Paul Bain		<p>Additional information added to this representation was received on 1st April 2018.</p> <p>With regard to the 'Spatial Objectives' box, respondent suggests the following additions:</p> <ul style="list-style-type: none"> To ensure all existing and future residents have safe footpath access to local amenities (in this case Alton Village and Churnet Valley). To identify high risk infrastructure areas on the Local Plan where residents are at risk and include these as development opportunities over the plan period. To identify high risk road junctions with high probability of injury/accident and develop proposals over the Local Plan period to reduce these risks to as low as reasonably practicable. To verify Parish boundary lines with Historic England. 	<p>With regard to the 'Spatial Objectives' box, respondent suggests the following additions:</p> <ul style="list-style-type: none"> To ensure all existing and future residents have safe footpath access to local amenities (in this case Alton Village and Churnet Valley). To identify high risk infrastructure areas on the Local Plan where residents are at risk and include these as development opportunities over the plan period. To identify high risk road junctions with high 	No	No	No	The existing objectives cover accessibility and safety. The verification of parish boundaries is not a spatial objective and they are not amended through the planning process.	No

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						<p>probability of injury/accident and develop proposals over the Local Plan period to reduce these risks to as low as reasonably practicable.</p> <ul style="list-style-type: none"> To verify Parish boundary lines with Historic England. 					
LPS40	Aims and Objectives	6	Mr Paul Bain		<p>The LPA have not provided evidence to demonstrate how they have complied with their 'duty of care' with respect to dangerous footpaths, dangerous junctions, low cost housing and the investigation of Alton parish boundaries. The respondent considers the LPA non-compliant with Spatial Aim SA2 (meeting the needs of our communities), Spatial Objective SO6 (to maintain and promote sustainable regenerated rural areas and communities with access to employment opportunities, housing and services for all) and Spatial Objective SO10 (to deliver sustainable, inclusive, healthy and safe communities).</p> <p>More specifically, the LPA have not carried out sufficient studies to demonstrate the following:</p> <ul style="list-style-type: none"> The Alton community have safe footpaths to local amenities. The Alton community have safe road junctions, namely '5 Ends'. The Alton community have designated low cost housing within the Local Plan. The Alton parish boundaries are correct and therefore residents who have historically contributed to the community are not excluded from future improvements within the delivery plan. 		No	No	No	<p>Highway safety has not been identified by the highways authority as a significant concern in Alton during the preparation of the Local Plan.</p> <p>Development proposals are considered in detail at the planning application stage when any arising matters should be addressed to the satisfaction of policies including SS1 and DC1 which require consideration of safety in design.</p>	No
LPS52	Aims and Objectives	6	Mrs Jane Bagguley		<p>Respondent makes the following points, with regard to Site EN128:</p> <ul style="list-style-type: none"> With regard to Spatial Objective 2, a stream runs through Site EN128 which, during heavy rainfall, becomes very swollen and fast flowing. Developing Site EN128 will increase the amount of hard standing, causing even greater run-off and flooding on the A53. Furthermore, development of Site EN128 would be detrimental to the environment. An ancient oak tree has already been removed. With regard to Spatial Objective 9, Site EN128 is the only green space in the area and its development would have an adverse effect on the character and distinctiveness of the countryside, and its biodiversity. 		No	No		<p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p>	No

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					<ul style="list-style-type: none"> With regard to Spatial Objective 10, developing Site EN128 would make Brookfield Avenue much more dangerous, particularly for children and parents going to and from St Luke's Junior School and Endon High School. School traffic on Brookfield Avenue uses the pavements for passing and parking, making it a very unsafe place. 					<p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p>	
LPS141	Aims and Objectives	6	Mr J Steele		<p>With regard to SO6, the Plan does not tackle the requirements of sustainable development in rural areas. Public transport in the form of bus services is either non-existent or under threat of reduction. If the plan were to go ahead, it would worsen air quality.</p> <p>Whilst it is pleasing to note the Council's support for the re-opening of the rail links in the District, there is no possibility of any viable commercial service within the lifetime of the Plan.</p>			No	No	<p>SO6 sets out the clear objective to maintain and promote the rural areas. However, it is recognised factors beyond the control of the planning process can also influence the sustainability of the rural areas. The policies in the Local Plan reflect this objective whilst directing more development to the towns which can accommodate large developments more sustainably.</p>	No
LPS164	Aims and Objectives	6	Mr Yendole	Forward Planning Stafford Borough	<p>Stafford Borough Council are generally supportive of the Aims and Objectives.</p> <p>Stafford Borough Council also welcome the opportunity to enter into a Statement of Common Ground with SMDC for submission</p>					<p>Support noted.</p>	No

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				Council	of the Local Plan.						
LPS200	Aims and Objectives	6	Mrs C Burton		With regard to SO2, development of Site EN128 will have a negative impact on the environment – adding to flood risk, pressure on drains, traffic and minimising safety for pedestrians and especially children at school times.			No		The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act. The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.	No
LPS205	Aims and Objectives	6	Mr R Burton		Dollisfield (Site EN128) is a natural habitat and open space located in a congested area. To replace it with a concentration of housing will not achieve SO9.			No		Note EN128 lies within the Endon settlement boundary therefore does not lie within the countryside. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.	No
LPS220	Aims and Objectives	6	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) are generally supportive of Spatial Objective SO11.					Support noted.	No
LPS224	Aims and Objectives	6	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Spatial Objective SO2 appears contrary to Policy SS1 and is not in accordance with the draft NPPF (March 2018). Paragraph 168 of the draft NPPF states "Planning policies and decisions should contribute to and enhance the natural and local environment...", which is very different from minimising impact. Staffordshire County Council (SCC) recommend that Spatial Objective SO2 be reworded to read: "To create a District where development contributes to enhancement of environmental quality...".					The Local Plan will be examined under the 2012 Framework. Nevertheless, Policy NE1 already includes references to enhancing the environment as did the policy in the Core Strategy from which SO2 is carried forward.	No
LPS235	Aims and Objectives	6	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) acknowledge and support Spatial Objective SO10, as well as the Plan's general references to health and the provision of health facilities. However, SCC feel that the Plan does not really cover the wider determinants of health and the specific role the Plan policies can have on the health of local residents. It is therefore suggested that there is continued dialogue and consultation with SCC's Public Health department.					SO10 sets the broad objective which will inform the ongoing co-operation between the Councils in relation to health and other matters.	No
LPS243	Aims and Objectives	6	Mr	National Planning	The Theatres Trust welcomes the Plan's support for and protection of community and cultural facilities including theatres,		Yes	Yes	Yes	Support noted.	No

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			Tom Clarke	Adviser Theatres Trust	as articulated through Spatial Objective SO7.						
LPS352	Aims and Objectives	6	Mr Paul Hill	RPS Planning & Development	See 'Summary of modification'.	Spatial Objective SO5 should read: "To ensure the long-term vitality and viability of the three market towns of Leek, Biddulph and Cheddleton through the concentration of development at these locations."		No		This modification is unnecessary as the spatial strategy already seeks to focus most development in the towns.	No
LPS382	Aims and Objectives	6	Ms Carolyn Walker		With regard to Spatial Objective SO4 and Blythe Vale, this is a contradiction. The development of Blythe Vale will require people to cross a notoriously dangerous dual-carriageway. As such, housing development at Blythe Vale will result in the isolation of the elderly and physically disabled. Other, more viable sites located in close proximity to village amenities are more suitable for development. The Plans propose a public crossing, but this will add to congestion.	In accordance with the NPPF, the Council should take into consideration the need to promote sustainable patterns of development. Thus smaller, well located sites close to towns and village boundaries should be considered for development.		No	No	The site is located to the south of Blythe Bridge. The policy specifies that the residential development should be located to the north of the site which is more closely related to the village of Blythe Bridge and also includes a requirement for development to improve sustainable transport routes and connectivity with Blythe Bridge.	No
LPS126	Paragraph	6.2	Mr John Wren		This paragraph does not contain anything specific about the protection of Green Belt land and the operation of national policy within it.	This paragraph should include reference to the Green Belt, and the implementation of section 9 of the NPPF.	Yes	No	Yes	The local plan does not need to replicate national policy.	No
LPS165	Spatial Strategy and Strategic Policies	7	Mr Yendole	Forward Planning Stafford Borough Council	Stafford Borough Council are generally supportive of the Spatial Strategy and Strategic Policies. Stafford Borough Council also welcome the opportunity to enter into a Statement of Common Ground with SMDC for submission of the Local Plan.					Support noted.	No
LPS201	Development Principles	Policy SS 1	Mrs C Burton		"A healthy, safe, attractive, active, well-designed and well-maintained environment" cannot be achieved through the development of Site EN128, which experiences flood problems and overcrowding by vehicles.			No		Representation relates to a site allocation. Policy SS1 does not allocate sites.	No
LPS213	Development Principles	Policy SS 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) have been working closely with SMDC to ensure the impacts on education infrastructure as a result of new housing proposals are understood. Subject to entering into a Statement of Common Ground (SOCG), SCC support Policy SS1 because it makes clear reference to the provision of education facilities.					Support noted.	No
LPS302	Development Principles	Policy SS 1	Mr Gez Willard	Willardwillard Ltd	Due to the significant under supply of housing, this policy should include a bullet point to this effect: "To take a positive attitude towards new housing and to significantly boost housing supply across the District."					It is implicit from the NPPF that the Local Plan should seek to boost the supply of housing. This is reflected through the Local Plan including Policy1a which explicitly sets out a presumption in favour of sustainable development.	No
LPS373	Development Principles	Policy SS	Mr		The approach taken in this policy is generally sound, particularly			No		Comment noted	No

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		1	Christopher Howle		with regards to the strategy of promoting a mix of types and tenure of residential development including bringing forward affordable and starter homes in a way that reinforces the local distinctive character of the towns and villages within Staffordshire Moorlands.						
LPS303	Presumption in Favour of Sustainable Development	Policy SS 1a	Mr Gez Willard	Willardwillard Ltd	This policy is supported.					Support noted.	No
LPS69	Settlement Hierarchy	Policy SS 2		Sterling Property Developments Ltd	Sterling Property Developments Ltd. supports Policy SS2 and its recognition that small villages play a role in meeting the development requirements of the District. The removal of development boundaries around the Smaller Villages is a forward thinking strategy that should allow for a supply of small scale development sites to come forward, as appropriate, to meet the long term sustainability requirements of these settlements. This should ensure the vitality of rural areas without placing undue development pressure on village cores.		Yes	Yes	Yes	Support noted.	No
LPS71	Settlement Hierarchy	Policy SS 2		The Winterton Lodge Partnership	The Winterton Lodge Partnership supports the removal of settlement boundaries around the Smaller Villages. This is because brownfield sites located around the Smaller Villages (e.g. the 65 acre Cotton College) could make valuable contributions to housing land supply to the benefit of the future vitality and viability of the Smaller Villages, and their associated services and facilities.		Yes	Yes	Yes	Support noted.	No
LPS94	Settlement Hierarchy	Policy SS 2	Mr R Thorneycroft		The respondent welcomes the identification of Leek as a principal town within the Borough, and a key focus for growth as expressed through this policy. They support the emphasis on encouraging new development proposals to be located within the settlement boundaries of Leek. Respondent owns a site in Leek that could potentially be developed (see Comment LPS93).					Support noted.	No
LPS104	Settlement Hierarchy	Policy SS 2	Mrs Lesley Roberts		The respondent agrees that adopting the hierarchy policy (Policy SS2) is useful when considering planning applications. However the smaller village boundaries should not be removed. Despite many objections from communities and parishes, this policy is still in the Plan. The respondent argues that boundaries appertaining to smaller villages are essential as they help prevent ribbon development. Respondent believes that keeping these boundaries that form part of the considerations of planning applications to extend the village, will give residents peace of mind.	Remove the reference to the loss of village boundaries as it will not affect the legality of the Plan, or Duty to Co-operate.	Yes	No	Yes	Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable. However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps. A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and	No

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										<p>character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS130	Settlement Hierarchy	Policy SS 2	St Modwen		Blythe Bridge & Forsbrook falls within the Rural Area Larger Villages category – the most sustainable settlements in the rural areas. The respondent has provided a table that compares Blythe Bridge & Forsbrook to the other higher tier settlements. It shows that Blythe Bridge is the most sustainable settlement within the Larger Villages category due to its proximity to services and facilities. Blythe Bridge & Forsbrook also performed very well in all the categories in the Halcrow Development Capacity Study (2011). The respondent has provided a list of all the services and facilities available in the village.					Representation noted.	No
LPS304	Settlement Hierarchy	Policy SS 2	Mr Gez Willard	Willardwillard Ltd	<p>The text in this policy is misleading given the shift in emphasis for housing sites away from the rural areas and into Cheadle. There is now little, if any, scope for growth within rural settlement boundaries. Furthermore, windfall allowance for housing adjacent to rural settlement boundaries is not a sustainable or certain way to plan for housing delivery.</p> <p>The text in this policy should be changed in order to facilitate growth in larger villages. However, it is not possible to suggest an alternative text until significant changes are made to settlement boundaries and the Plan itself.</p>				<p>The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The hierarchy in SS2 is still considered to be consistent with this approach.</p> <p>The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas.</p> <p>The policy approach to windfall is more positive than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward. However, Policy H1 also now sets out detailed criteria to ensure that development is appropriately managed having regards to the role of the villages, their character and constraints.</p>	No	
LPS318	Settlement Hierarchy	Policy SS 2	Mr Martin Webb		The respondent supports the fact that Biddulph Moor is identified as a larger village. However, they contend that the lack of housing allocated to Biddulph Moor is inconsistent with Policy SS2. The Green Belt boundary would remain tightly drawn around the settlement, with few if any opportunities available to provide housing.			No	No	SS2 does not state that sites should be designated in all of the larger villages. It is not considered that exceptional circumstances exist to release further Green Belt land.	No
LPS374	Settlement Hierarchy	Policy SS	Mr		Respondent agrees with the approach towards focusing future			No		The approach to the other rural areas has regards to the need	No

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		2	Christopher Howle		growth in the three main towns (Biddulph, Leek and Cheadle). However, consideration should be given to whether sites within the 'Other Rural Areas' could contribute positively to the wider strategy for growth of the three main towns.					to promote sustainable development. Nevertheless, appropriate development may come forward where appropriate opportunities arise such as the regeneration of major developed areas, rural exception sites, conversions and replacement dwellings (Policy SS10, H1 and H3).	
LPS384	Settlement Hierarchy	Policy SS 2	Seabridge Developments Limited		This representation is submitted by an agent on behalf of Seabridge Developments Limited. They support the fact that Biddulph is identified as one of three towns where future growth is to be focussed.		Yes	Yes	Yes	Support noted.	No
LPS414	Settlement Hierarchy	Policy SS 2	Wainhomes (North West) Limited		<p>Respondent has concerns regarding Leekbrook's identification as a 'smaller village' within the hierarchy. Policy SS2 states that within the smaller villages only limited development will be allowed, and furthermore the development boundaries established in the adopted Local Plan will be removed. The respondent considers that the proposed approach is wholly inappropriate, not justified and inconsistent with the wider strategy of the Plan.</p> <p>The respondent notes that Leekbrook is specifically identified within the spatial strategy to provide the majority of employment land for Leek under Policies SS5 and E2. Respondent suggests that Leekbrook should be treated as part of Leek in terms of the spatial strategy, and specifically for the purposes of Policies SS2, SS5 and H1. If Leekbrook is not included as part of Leek then as a minimum it should be designated as a 'larger village' as it does not fit the profile of a smaller village as defined in Policy SS2.</p> <p>Notwithstanding, the respondent also has concerns in relation to the approach towards the smaller villages as set out under Policies SS2, SS9 and H1. The respondent considers that the proposed approach of only allowing 'limited development' within the smaller villages and not defining a development boundary to be unduly restrictive. The respondent notes the Council's approach is predicated upon accessibility to services to facilities. This is argued to be inconsistent with the NPPF as accessibility is only one strand of sustainable development and there is a need to take into account other policies in the Framework, particularly in rural areas.</p> <p>The respondent notes the decision to remove the existing development boundary for Leekbrook, or indeed any of the other villages, is not justified. The evidence base does not provide any analysis of the physical form and character of these settlements, their contribution and role in terms of the open countryside (given that this will be their designation will be), and whether there are opportunities for development within them (infill or otherwise).</p>		No	No	<p>Leekbrook was identified as a smaller village in the Core Strategy. There is no material evidence to indicate that the settlement has become more sustainable for housing development since 2014.</p> <p>Leekbrook's contribution towards Leek's employment land requirement was a principle agreed in the Core Strategy. Industrial estates are often peripheral to the towns that they serve as is the case with the Leekbrook allocations.</p> <p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are</p>	No	

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										available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.	
LPS523	Settlement Hierarchy	Policy SS 2	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	The respondent considers the Plan unsound and makes representations on a number of policies with reference to Brown Edge and the potential allocation of land at Willfield Lane (BE041). The respondent gives support to general tiers in the settlement hierarchy and the definition of larger villages provided under Policy SS2.			No	No	Support for SS2 noted.	No
LPS537	Settlement Hierarchy	Policy SS 2	Muller Property Group		The respondent maintains their support for this policy.					Support noted.	No
LPS434	Settlement Hierarchy	Policy SS 2	Richard House	Gladman	Gladman is of the view that the Plan strategy fails to recognise that there is a need for rural settlements to accommodate a scale of development that will enable them to improve their sustainability over the plan period. As such, the amount of housing in the larger villages should be increased in order to assist in securing the long term vitality and viability of the rural areas. Whilst the main towns must play a key role in the accommodation of future development within the district, this should not be at the expense of ensuring that the housing and employment needs of other settlements are met. Paragraph 55 of the NPPF seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability.	There should be additional housing allocations in the rural settlements.	Yes	No	Yes	The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The hierarchy in SS2 is still considered to be consistent with this approach. The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas. The policy approach to windfall is more positive than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward. However, Policy H1 also now sets out detailed criteria to ensure that development is appropriately managed having regards to the role of the villages, their character and constraints.	No
LPS305	Paragraph	7.21	Mr Gez Willard	Willardwillard Ltd	Due to low land values and developer profit margins in Staffordshire Moorlands, it is incumbent (not essential) that the Plan sets out a clear and certain strategy for addressing the significant shortfall in affordable housing provision. This needs to be addressed by allocating sites where there is clarity at allocation stage that these sites can deliver high levels of affordable housing in accordance with relevant policies. The respondent does not suggest alternative wording because what is required is a Plan that meets affordable housing needs.					The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing (330dpa). In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range. Site viability has been considered during the preparation of the plan which seeks to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage.	No
LPS306	Paragraph	7.22	Mr Gez Willard	Willardwillard Ltd	The respondent does not comment or object, at this stage, to a target of 320 new homes per annum during the plan period.					Comment noted.	No
LPS307	Paragraph	7.23	Mr	Willardwillard	This paragraph is not sound because it is very unlikely that 320			No		The plan is supported by a viability assessment.	No

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			Gez Willard	Ltd	houses per year can be built when historic rates (195) are only a little over half that figure. It is right to boost housing supply but to do so the Plan should allocate sites which are deliverable and for which there is market interest and sufficient developer profit to support investment risk.						
LPS106	Paragraph	7.24	Mr T A J Campbell		<p>With regard to the final sentence in Paragraph 7.24, it does not say what the Council will do if there is a shortfall in housing numbers. This is not in accordance with section 6 of the NPPF. The recognition that the requirement of 6,080 dwellings is not an absolute is welcome but in a District where Green Belt is important there is a need to be more specific about the action that will be taken if the allocated areas do not produce a five year supply of deliverable housing sites.</p> <p>Currently, in respect of Cheadle, the Local Plan has not followed the guidance in Paragraph 85 of the NPPF because it has not identified any areas of safeguarded land between the town and a revised Green belt boundary (which should be based on the physical features that exist to the south of the identified Moberley Strategic Development Area). Development of this area is fully justified in the view of the owners because the larger area could spread infrastructure costs more easily and create screening where it is apparently thought to be desirable. Having identified that this land is not crucial to the reasons for creating Green Belts, the Local Plan should indicate that this land is safeguarded should it be necessary for future longer-term development.</p>	The Plan should contain a commitment that the Council will allocate further housing sites if those currently allocated do not provide a five year supply of deliverable sites. The Council should also reconsider its approach to the Green Belt in areas where moving the boundary is the only feasible option to widen the range of housing sites contributing to the five year supply of deliverable sites. In the case of Cheadle, the smallest area possible has been taken out of the Green Belt. However, following the guidance about defining boundaries in Paragraph 85 of the NPPF should have led to a much bolder approach which would better meet the strategic aim set out in Policies SS1 and SS7.	Yes	No	Yes	<p>Housing delivery will be monitored to determine the on going effectiveness of housing policies. Policy SS4 states:</p> <p><i>"The release of land for housing and employment across the District will be managed in order to deliver the level and distribution of development set out above. The adequacy of supply (in terms of five year supply of housing and in meeting planned housing delivery targets over the full plan period) will be assessed and monitored through reviews of the Strategic Housing and Economic Land Availability Assessment (SHELAA) and progress will be reported in the Annual Monitoring Report. If necessary the Council will review the Local Plan to bring forward additional sites for development."</i></p> <p>Amendments to the regulations now requires local authorities to review their Local Plans every 5 years. The draft NPPF also makes provisions for appropriate actions to facilitate development under a new Housing Delivery Test.</p>	No
LPS376	Paragraph	7.28	Mr Christopher Howle		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 the Green Belt. This is particularly the case when Green Belt release involves the natural rounding off of development boundaries.			No		Green Belt should only be released in exceptional circumstances. The Local Plan seeks to protect the Green Belt as far as possible in line with the NPPF and the Council does not consider that further Green belt release is necessary to support the housing requirement.	No
LPS17	Future Provision and Distribution of Development	Policy SS 3	Mr John Pigott		Respondent queries the allocation of housing development between the three towns and Rural Areas. With the exception of Blythe Vale, there are only five other sites in the Rural Areas allocated for major development. Instead of developing The Mount which is a valuable recreational area, the Council should consider reducing the allocation in Leek to 25% and increase the Rural Areas to 30%, which they were originally.	Respondent suggests that there should be some housing allocations in the larger villages of Cheddleton and Ipstones. Local housing is required in Cheddleton by the employees of the expanding waste processing plant there.		No		The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3 submission Local Plan. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible. The Leek requirements are retained from Policy SS3 in the adopted 2014 Core Strategy, which was found sound by Inspector. The Biddulph % requirement is lower than Leek, but Biddulph is a smaller town entirely constrained by surrounding Green Belt, as well as experiencing topographical issues. Cheadle, again a smaller town, has 25% requirement. Green Belt is a significant constraint for many of the Rural Areas villages as it can only be released in exceptional circumstances. Cheadle's housing share has risen from the 22% previously put forward in the Core Strategy to reflect the availability of suitable development sites	No

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										<p>outside the Green Belt.</p> <p>The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The Green Belt Review Study provides a strategic review of Green Belt purposes and a more detailed site-based assessment of land which could be considered for review. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the submission Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p> <p>The supporting text to Policy SS2 explains how the spatial strategy maintains a settlement hierarchy based on Core Strategy Policies SS6/6A/6B/6C so as to create sustainable, self supporting communities. This categorisation of villages was based on their population, services, facilities and capacity for development.</p> <p>Policies SS2, SS8 and SS9 in the Local Plan set out the differing roles of larger villages and smaller villages. Larger villages are considered as service centres to be sensitively enhanced, including with proportionate additional housing (including in some cases housing allocations). Whereas smaller villages have a more limited role for local housing and rural employment needs. These (and other) policies also support further employment and facilities growth in these villages so as to become more self-sustaining.</p> <p>The suite of rural housing allocations within the Local Plan is considered to reflect this: generally only larger villages contain land allocations; and those that do tend to be larger with more services. Note that under Local Plan Policies SS8 and H1 housing development upon unallocated sites within/around larger villages may also be acceptable.</p>	
LPS72	Future Provision and Distribution of Development	Policy SS 3		The Winterton Lodge Partnership	The Winterton Lodge Partnership supports the principle that 25% of the District's housing requirement over the plan period should come forward in the Rural Areas.		Yes	Yes	Yes	Support noted.	No
LPS118	Future Provision and Distribution of Development	Policy SS 3	Mr Kenneth Wainman	Ken Wainman Associates Ltd	Please see Comment LPS102 where it is contended that the policy will not be effective in providing housing, particularly affordable housing, in both the larger and smaller villages and the rural areas to meet community needs. The unsoundness of Policy SS4 could have implications for Policy SS3.	No modifications have been stated.	Yes	No	Yes	<p>The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing.</p> <p>In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range.</p> <p>Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites</p>	No

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										<p>above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage.</p> <p>To provide precise housing/affordable housing requirements for individual villages would be overly prescriptive and inflexible. Furthermore, affordable housing needs at this level tend to reflect much shorter timeframes than the Local Plan.</p>	
LPS131	Future Provision and Distribution of Development	Policy SS 3	St Modwen		The provision of at least 6,080 additional dwellings and at least 27 hectares of additional employment land (excluding the Blythe Vale employment allocation) is supported. Furthermore, with half of the District's occupants living in the Rural Areas (Paragraph 7.15), the distribution of 25% of the housing growth and 30% of the employment growth to these areas is consistent.					Support noted.	No
LPS179	Future Provision and Distribution of Development	Policy SS 3	Mr N Weaver, Mrs B D Eastwood, Mr R Weaver and Mr P Weaver		<p>This paragraph confirms that the top of the range housing projection relates to the level of housing growth required to support potential employment growth, whilst the bottom reflects household projections. The lesser figure would lead to a decline in the number of jobs in the District due to a decline in the working age population. The Plan states that the Council is proposing to adopt a housing requirement of 320 dwellings per year, which is 10 dwellings per year less than the upper figure identified in the SHMA update (2017).</p> <p>Although the Council states that the proposed housing target is 'aspirational but realistic' as required by the NPPF, it is not clear why the Council is proposing to adopt a housing requirement below the upper figure identified within the SHMA, particularly when the Council's historic under delivery of housing allocations and permissions is taken into account.</p> <p>As such, respondent is concerned as to whether the housing requirement can be considered positively prepared (i.e. based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including un-met requirements from neighbouring authorities). They are also concerned with whether the Local Plan will be effective and deliver the level of housing required in the Housing Market Area and if the housing requirement is justified (i.e. the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence).</p> <p>In summary, the respondent is concerned that the housing requirement identified fails to satisfy the tests of soundness in the NPPF, as well as the Duty to Cooperate. As a minimum, the Council should adopt the upper figure of 330 dwellings per year over the plan period. Appropriate consideration should also be given to whether the Plan appropriately takes into account the housing requirements of the adjacent authorities.</p>		No	No	No	<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p>	No
LPS234	Future Provision and	Policy SS	Mrs		The respondent argues the Plan is unsound and not legally			No	No	The Local Plan seeks to carry forward the spatial distribution of	No

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	Distribution of Development	3	Anne John		compliant. This due to ignoring local residents objections, allowing the expansion of villages, and a lack of compliance with the SMDC Core Strategy, Churnet Valley Masterplan and Neighbourhood Plans.					development from the Core Strategy with the exception of reducing the Rural Areas requirement by 3% and increasing the Cheadle requirement by the same amount. This amendment was proposed to reduce Green Belt release in the Rural Areas. The overall level of housing proposed has been increased from 300 to 320dpa in response to new evidence. Other policies in the Local Plan will also ensure that development is managed appropriately. This includes policies which support and provide guidance for the Churnet Valley and neighbourhood plans.	
LPS262	Future Provision and Distribution of Development	Policy SS 3	Benny John		The respondent argues the Plan is unsound and not legally compliant. This due to SMDC ignoring local residents' objections and allowing for the uncontrolled expansion of villages. They do not support the lack of constraint on future development. Additionally, the Plan lacks compliance with the Core Strategy, Churnet Valley Masterplan and Neighbourhood Plans.			No	No	The consultation statements set out how consultation feedback has been sought and considered during the preparation of the plan. Policy SS11 is largely the same as the approach to the Churnet Valley as the adopted Core Strategy. The policy provides a clear link to the Churnet Valley Masterplan. The Local Plan clearly identifies the strategic policies that emerging neighbourhood plans must be in general conformity with in order to assist their preparation.	No
LPS270	Future Provision and Distribution of Development	Policy SS 3	Ollerton Estates LLP and Staffordshire County Council (SCC)		The Council's approach to calculating housing need is considered to accord with national policy. Ollerton Estates and Staffordshire County Council (SCC) consider that the need for 6,080 net dwellings, with 30% to be apportioned to Leek, is justified.			Yes		Support noted.	No
LPS278	Future Provision and Distribution of Development	Policy SS 3	Dean Lewis Estates		Respondent has attached their representation submitted at the Preferred Options Sites and Boundaries stage, which should be read in conjunction with this one. Respondent objects to the Local Plan on the grounds that it is unsound: <ul style="list-style-type: none"> The Plan is not positively prepared because it will fail to meet objectively assessed development and infrastructure requirements. The Plan fails to address the problems associated with housing delivery, affordable housing, employment and infrastructure. It does not consider any realistic alternative delivery options to achieve even the minimum growth requirements. The Plan is ineffective in that it is undeliverable over its period. It is inconsistent with national policy and will deny the delivery of sustainable development. <p>The assertion that sufficient deliverable land will be identified to provide at least 5 years of development and that provision will be made for 6,080 dwellings lacks credible evidential basis. Monitoring from the last five years reveals that only 679 dwellings</p>			No		The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that: <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in</p>	No

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					<p>have been built. Yet the amount of potentially implementable planning permissions available during the last three years amounts to an annual average of 1,266 dwellings (the Council's annual monitoring of housing completions for the years 2012-13 and 2013-14 is unavailable at the time of writing). Therefore, the availability of potentially implementable planning permissions for 1,266 units resulted in 136 dwellings per annum. This amounts to an 11% conversion rate against what the Council deemed to be a deliverable housing supply during the 5 year period. The actual delivery against the housing target within the same 5 year monitoring period resulted in 57% under delivery of housing. The respondent makes reference to a slide from the 'DCLG Planning Update' presentation (Ruth Stanier), which shows that 10-20% non-implementation rate on all permissions granted is a realistic guide on a national basis.</p> <p>Moreover, the amount of land required to ensure delivery of the 6,080 housing target within the plan period is exponentially greater than the quantum of land presently identified as proposed allocations within the Plan. Furthermore, the Council's assumption that what it terms 'Commitments' will all be converted from planning permissions into new dwellings is unjustified. The Council asserts that 100% of the sites with planning permission (1,442) will come forward and therefore reduce the residential housing requirement accordingly. There is no allowance for slippage. Lastly, the Plan relies on a 27.7% (=1,070 dwellings) windfall allowance as an essential component of the residual housing target. However, this does not constitute a plan led approach. Given the fragility of the existing deficient supply and the significantly high rate of attrition between the conversion of consents granted into built development, the only rationale approach is for land to be allocated to deliver new homes. Any windfall allowance should be modest and regarded as being over and above the OAN target, which is a minima in any case.</p>						<p>annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>Specifically in relation to the low rate of delivery in comparison to commitments, this issue is recognised by the Council. Closer analysis of the unimplemented planning permissions suggests that these sites are generally small sites where only 1 to 5 homes are proposed. There has been a limited number of sites with more significant scale development proposed. It should also be recognised that this period of under delivery coincides with the absence of a Local Plan complete with allocations which will provide greater certainty and opportunities to developers and support investment.</p> <p>Furthermore, the Local Plan allocates a number of strategic sites of a sufficient scale and nature so as to further encourage investment and provide a more diverse housing supply than the District has been afforded historically. 56% of the residual housing requirement is planned to be met on site between 179 and 588 dwellings.</p> <p>Finally, the Council is in the process of implementing a more pro-active approach to housing delivery working with landowners and developers to seek to improve the rate of development.</p>	
LPS308	Future Provision and Distribution of Development	Policy SS 3	Mr Gez Willard	Willardwillard Ltd	<p>It is considered that there is no evidence that this policy can deliver sufficient housing, meet the needs of rural areas or provide sufficient affordable housing. The respondent is particularly concerned that the Moberley Farm site would not be able to deliver housing (and the link road) during the plan period.</p> <p>The respondent suggests that the housing distribution be revised back to its 2016 rates: Leek 30%; Biddulph 20%; Cheadle 22% and; Rural Areas 28%.</p>					<p>Sufficient land has been identified to accommodate the identified needs through commitments, allocations and windfall allowance. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle.</p> <p>The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing.</p> <p>In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range.</p> <p>The Moberley Strategic Development Area is considered to be</p>	No	

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										deliverable and requires the construction of development access roads along the safeguarded route for a potential future link road.	
LPS336	Future Provision and Distribution of Development	Policy SS 3	Mr Gez Willard	Willardwillard Ltd	<p>See comments LPS302-3014, LPS316-LPS317 and LPS319-335. Respondent objects to the Plan on the grounds it is unsound. They make the following points:</p> <ul style="list-style-type: none"> It does not provide a clear and certain indication of how a decision maker should react to a development proposal. This is considered especially so in the case of delivering housing on windfall sites in the rural areas, for delivering affordable housing and for road proposals in respect of Moberley Farm. The Plan has turned its back on the evolutionary plan making process. The existing Core Strategy (which is considered to be both sustainable and sound) sets out a plan for the apportionment of housing across the District and the justifiable release of land from the Green Belt. There should be no change to the adopted housing distribution contained within the adopted Core Strategy. The Plan is considered to have moved very significantly from the strategy as set out in the Core Strategy and as set out as recently in the Staffordshire Moorlands Local Plan: Preferred Options Sites and Boundaries (dated April 2016). This is especially so with regard to the following changes now proposed: (1) the apportionment of housing between Cheadle and the Rural Areas; and (2) the very significant reduction in housing allocations in the larger villages. These changes cause problems for the delivery of housing. The Plan fails to plan positively for housing. It was looking to do so in the Preferred Options Sites and Boundaries (dated April 2016) but as a result of local councillor pressure, the Council has now prepared a Plan which is negative and fails to plan positively for housing, meet the needs of rural areas or put in place proposals to deliver sufficient affordable housing. 			No		<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build. It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>Specifically in relation to the low rate of delivery in comparison to commitments, this issue is recognised by the Council. Closer analysis of the unimplemented planning permissions suggests that these sites are generally small sites where only 1 to 5 homes are proposed. There has been a limited number of sites with more significant scale development proposed. It should also be recognised that this period of under delivery coincides with the absence of a Local Plan complete with allocations which will provide greater certainty and opportunities to developers and support investment.</p> <p>Furthermore, the Local Plan allocates a number of strategic sites of a sufficient scale and nature so as to further encourage investment and provide a more diverse housing supply than the District has been afforded historically. 56% of the residual housing requirement is planned to be met on site between 179</p>	No

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										<p>and 588 dwellings.</p> <p>Finally, the Council is in the process of implementing a more pro-active approach to housing delivery working with landowners and developers to seek to improve the rate of development.</p> <p>The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The hierarchy in SS2 is still considered to be consistent with this approach.</p> <p>The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas.</p> <p>The policy approach to windfall is more positive than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward. However, Policy H1 also now sets out detailed criteria to ensure that development is appropriately managed having regards to the role of the villages, their character and constraints.</p>	
LPS340	Future Provision and Distribution of Development	Policy SS 3	Mr Martin Webb		<p>The proposed housing requirement of 320 net additional dwellings per annum is not consistent with the OAN identified through the Council's evidence base. Whilst the difference between the OAN and housing requirement is only 10 dwellings per annum, this amounts to 190 dwellings over the period 2012-2031. There is also a very high level of previously unmet housing need arising from a failure to meet past requirements (see Table 5.1 in the attached).</p> <p>In addition, the housing requirement in the Plan represents a significant reduction in comparison to what was required in the Core Strategy post-2016. The approach taken is not consistent with planning positively or boosting significantly the supply of housing land, as required by the Framework. Furthermore, no provision has been made within the housing requirement for C2 uses for older persons accommodation. Table 7.8 of the SHMA Review 2017 identifies that the communal population is anticipated to grow significantly during the plan period. However, the Submission Version Plan does not refer to meeting this need and it is not included within the OAN. This is contrary to Paragraph 50 of the NPPF and Paragraphs 3-037 and 2a-021 of the PPG. The need for C2 accommodation should be added to the identified OAN.</p> <p>Lastly, it is necessary to consider whether there should be an uplift to the housing requirement in order to meet affordable housing needs. The affordable housing need is 224-432 per annum. However, even on the lower figure of 224 per annum, the affordable housing need is very severe and represents 70% of the overall housing requirement. There would be a very significant and serious shortfall in affordable housing based upon the Plan as currently drafted. The Council should consider a 10% uplift, as</p>		No	No	<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. • The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the</p>	No	

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					suggested in the SHMA Update 2017.					<p>Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>Specifically in relation to the low rate of delivery in comparison to commitments, this issue is recognised by the Council. Closer analysis of the unimplemented planning permissions suggests that these sites are generally small sites where only 1 to 5 homes are proposed. There has been a limited number of sites with more significant scale development proposed. It should also be recognised that this period of under delivery coincides with the absence of a Local Plan complete with allocations which will provide greater certainty and opportunities to developers and support investment.</p> <p>Furthermore, the Local Plan allocates a number of strategic sites of a sufficient scale and nature so as to further encourage investment and provide a more diverse housing supply than the District has been afforded historically. 56% of the residual housing requirement is planned to be met on site between 179 and 588 dwellings.</p> <p>The Council is in the process of implementing a more pro-active approach to housing delivery working with landowners and developers to seek to improve the rate of development.</p>	
LPS347	Future Provision and Distribution of Development	Policy SS 3	Mr Paul Hill	RPS Planning & Development	<p>The Local Plan indicates an Objectively Assessed Need for Housing (OAN) of 6,080 dwellings across the period 2012 to 2031. This equates to an annual need of 320 dwellings per annum (dpa). This figure emerged from the February 2017 Strategic Housing Market Assessment (SHMA) which tested a number of growth scenarios before falling on a preferred range between 235dpa and 330dpa. RPS acknowledge that the Council has opted to support housing need towards the top end of the spectrum. However, they recommend that the Council provide 330dpa. This is because the Local Plan makes reference to high levels of affordable housing need in Staffordshire Moorlands, identifying a backlog of 408 homes and a forecast need of between 224 and 432 affordable dwellings per annum. This is a significant need and deviating from this higher requirement for a lower figure (as the plan currently does) diminishes the Council's ability to meet affordable need.</p> <p>Additionally, RPS query why such a large proportion of growth (30% in Rural Areas) has been directed to locations less sustainable than the main towns. As such, RPS encourage the Council to reconsider the approach towards employment development in the Rural Areas, and test increased levels of employment growth at Cheadle. The business park at Cheadle may be able to accommodate further growth.</p>	<p>The housing requirement should be increased from 320dpa to 330dpa. Additionally, the amount of housing and employment development in the Rural Areas should be reduced to 20% and 25% respectively, with a corresponding increase at Cheadle to 30% housing and 25% employment.</p>		No		<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build. • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. • The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green</p>	No

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										<p>Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>Finally, the Council is in the process of implementing a more pro-active approach to housing delivery working with landowners and developers to seek to improve the rate of development.</p> <p>The level of development proposed for the Rural Areas balances the need to direct development towards the most sustainable and least constrained locations whilst supporting the sustainability of rural communities.</p>	
LPS375	Future Provision and Distribution of Development	Policy SS 3	Mr Christopher Howle		The Council is proposing to deliver 320 dwellings per year between 2016 and 2031. However, this figure is below the Objectively Assessed Need of 330 dwellings per year. As such, the Plan is unsound.			No		<p>The 2017 SHMA Update identified an objectively assessed need for housing of 235 to 330 homes per year. This assessment was undertaken in line with the National Planning Practice Guidance applying the 2014-based sub national population projections and household projections alongside market signals, the need for affordable housing and economic growth scenarios.</p> <p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. • The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced</p>	No

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										range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.	
LPS380	Future Provision and Distribution of Development	Policy SS 3	Ms Carolyn Walker		Blythe Vale is not part of the settlement for residential dwellings and is classified as B1 & B2 use land. Seeing as the Blythe Vale is proven to not be commercially viable as it has been 'up for sale' since the 1990s after the Council released it from the Green Belt, would it not be more appropriate to put the designated B1 and B2 area back into the Green Belt and release the small pockets on the edges of the villages to 'round off development'?	In accordance with the NPPF, the Council should take into consideration the need to promote sustainable patterns of development. Thus smaller, well located sites close to towns and village boundaries should be considered for development.		No	No	<p>Policy H2 allocates sites for residential development and includes six sites in the Rural Areas. The Rural Areas is heavily constrained by the green belt. The Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. The Blythe Vale site is not in the green belt its allocation contributes towards the Local Plan meeting the housing requirement in line with the principles of the Spatial Strategy without removing a significant number of sites from the green belt.</p> <p>The site is located to the south of Blythe Bridge. The policy specifies that the residential development should be located to the north of the site which is more closely related to the village of Blythe Bridge and also includes a requirement for development to improve sustainable transport routes and connectivity with Blythe Bridge.</p>	No
LPS385	Future Provision and Distribution of Development	Policy SS 3	Seabridge Developments Limited		This representation is submitted by an agent on behalf of Seabridge Developments Limited who object to the proposed distribution of housing. Although they consider the Council is correct to reduce the Rural Areas allocation from the 30% stated in the Core Strategy, the distribution to Biddulph should be increased to match the 25% proposed for Cheadle. No less than the 22% proposed for Cheadle in the Core Strategy should be provided.			No	No	Increasing the requirement for Biddulph would necessitate further Green Belt release. The Council does not consider that exceptional circumstances exist for this as the Local plan requirement as a whole can be met without further release in Biddulph.	No
LPS415	Future Provision and Distribution of Development	Policy SS 3	Wainhomes (North West) Limited		<p>The proposed housing requirement of 320 net additional dwellings per annum is not consistent with the OAN identified through the Council's evidence base. Whilst the difference between the OAN and housing requirement is only 10 dwellings per annum, this amounts to 190 dwellings over the period 2012-2031. There is also a very high level of previously unmet housing need arising from a failure to meet past requirements (see Table 5.1 in the attached).</p> <p>In addition, the housing requirement in the Plan represents a significant reduction in comparison to what was required in the Core Strategy post-2016. The approach taken is not consistent with planning positively or boosting significantly the supply of housing land, as required by the Framework. Furthermore, no provision has been made within the housing requirement for C2 uses for older persons accommodation. Table 7.8 of the SHMA Review 2017 identifies that the communal population is anticipated to grow significantly during the plan period. However, the Submission Version Plan does not refer to meeting this need and it is not included within the OAN. This is contrary to Paragraph 50 of the NPPF and Paragraphs 3-037 and 2a-021 of the PPG. The need for C2 accommodation should be added to the</p>			No	No	<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. • The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in</p>	No

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					<p>identified OAN.</p> <p>Lastly, it is necessary to consider whether there should be an uplift to the housing requirement in order to meet affordable housing needs. The affordable housing need is 224-432 per annum. However, even on the lower figure of 224 per annum, the affordable housing need is very severe and represents 70% of the overall housing requirement. There would be a very significant and serious shortfall in affordable housing based upon the Plan as currently drafted. The Council should consider a 10% uplift, as suggested in the SHMA Update 2017.</p>					<p>annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>Specifically in relation to the low rate of delivery in comparison to commitments, this issue is recognised by the Council. Closer analysis of the unimplemented planning permissions suggests that these sites are generally small sites where only 1 to 5 homes are proposed. There has been a limited number of sites with more significant scale development proposed. It should also be recognised that this period of under delivery coincides with the absence of a Local Plan complete with allocations which will provide greater certainty and opportunities to developers and support investment.</p> <p>Furthermore, the Local Plan allocates a number of strategic sites of a sufficient scale and nature so as to further encourage investment and provide a more diverse housing supply than the District has been afforded historically. 56% of the residual housing requirement is planned to be met on site between 179 and 588 dwellings.</p> <p>The Council is in the process of implementing a more pro-active approach to housing delivery working with landowners and developers to seek to improve the rate of development.</p>	
LPS422	Future Provision and Distribution of Development	Policy SS 3	Mr Greg Powell	Cheadle Unite	<p>Cheadle Unite object to the Plan because they believe the level of housing provision to be excessive. In 2016, SMDC chose to ignore the official 2012 Office for National Statistics Sub-National Population Predictions, which projected a reduced and levelling off of the population across the Moorlands (see Figure 2.2 in the attached). SMDC also ignored the 2015 Department for Communities and Local Government household predictions, which translated the reduced population into a much reduced housing requirement of only 2,573 dwellings across the Moorlands. Yet SMDC proposes the development of 6,080 dwellings.</p> <p>SMDC commissioned Lichfields to produce a piece of work to support this high level of housing provision. Their report draws the assertion that, due to an ageing population, in order to see a net gain of just 85 jobs through to 2031 it is necessary to secure a net migration of 78,697 people into the area (7.27). This is, however, an unsustainable model. The document contains a graph in Figure 5.1 (can also be found in the attached) that highlights how the Oxford Economics model data pushes the OAN range well above the level that would exist due to ONS natural</p>	The level of housing proposed for the Moorlands and Cheadle should be reduced, in line with the 2012 Office for National Statistics Sub-National Population Predictions and the subsequent 2015 DCLG household predictions which translate into a much reduced housing requirement of only 2,573 dwellings across the Staffordshire Moorlands with a proportionate decrease for Cheadle.	No	No	No	<p>The presumption in favour of sustainable development in the NPPF makes it clear that the Local Plan should meet the objectively assessed need for housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the NPPF indicate that development should be restricted.</p> <p>The 2017 SHMA Update identified an objectively assessed need for housing of 235 to 330 homes per year. This assessment was undertaken in line with the National Planning Practice Guidance applying the 2014-based sub national population projections and household projections alongside market signals, the need for affordable housing and economic growth scenarios.</p> <p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p>	No

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					<p>local population growth, and the housing needs from the 2015 DCLG housing level predictions. Despite many residents raising this concern throughout the consultation process, SMDC continue to pursue the same agenda. Furthermore, the Lichfields report was not consulted on.</p> <p>The Oxford Economics model is flawed in that it does not identify how it will ensure that the new houses will in fact be occupied by a working age population. Cheadle Unite estimate that it has far greater potential to exacerbate the problem and increase demand on already over-stretched resources.</p> <p>Karen Bradley MP and the previous Housing Minister Brandon Lewis MP made it clear on local radio and in writing that it is for the local community to decide the level of housing that they require. However, the SMDC leader Sybil Ralphs stated that the Planning Inspector effectively sets the level. While SMDC can set a lower figure, the Planning Officer will simply reject it.</p> <p>SMDC have evidence from the consultations in 2009, 2010, 2012 and 2014, and a petition of over 1,000 signatures to Parliament and over 5,500 responses from the local community, that residents are against the excessive housing levels proposed. SMDC have failed to detail any attempt to reduce the allocation.</p> <p>Lastly, SMDC's Housing Strategy hopes to secure a 'New Homes Bonus' whereby Council Tax income from new houses is equally matched from central government funding for 6 years. There are no restrictions on how, or where, this money is spent.</p>				<ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build . It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>The approach for Cheadle is supported by the SA.</p>		
LPS448	Future Provision and Distribution of Development	Policy SS 3	Mr A Weston		<p>Housing numbers for the district and Cheadle are too high.</p> <p>Housing proposed in the north of Cheadle should be reduced and the school should be relocated to a more sustainable area.</p>	Reduce the housing numbers for the district and Cheadle. Additionally, relocate the school in Cheadle.		No	No	<p>The presumption in favour of sustainable development in the NPPF makes it clear that the Local Plan should meet the objectively assessed need for housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the NPPF indicate that development should be restricted.</p> <p>The 2017 SHMA Update identified an objectively assessed need for housing of 235 to 330 homes per year. This assessment was undertaken in line with the National Planning Practice Guidance applying the 2014-based sub national population projections and household projections alongside market signals, the need for affordable housing and economic growth scenarios.</p> <p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also 	No

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										<p>increases the scope to provide specialist housing such as Self-Build and Custom Build -</p> <ul style="list-style-type: none"> It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Cheadle is identified as a town in the plan on the basis that it provides arrange of facilities and services which support the sustainability of development. The SA considered strategic growth options for Cheadle and favours the preferred approach.</p>	
LPS504	Future Provision and Distribution of Development	Policy SS 3	Mr Grant Anderson	Fradley Estates	<p>Fradley Estates (FE) object to this policy in respect of the distribution of development to Cheadle and the Rural Areas. 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 Rural Areas of 180 units and an increase in the distribution to Cheadle of 180 units (i.e. a change of 360 units). The policy fails the test of soundness, and the approach is not justified as being the most appropriate strategy when considered against reasonable alternatives.</p> <p>The strategy proposed in this policy will significantly lower the amount of housing to come forward in the Rural Areas. This is contrary to the Spatial Vision of the Plan which seeks to create "sustainable and balanced urban and rural communities". Furthermore, it prejudices the Vision for Rural Areas, in particular the Larger Villages which the Local Plan states "will be the rural centres for services, facilities and jobs acting to sustain the rural areas".</p> <p>Additionally, this policy is inconsistent with Policy SS2, which states that the Local Plan seeks to carry forward the development approach from the Core Strategy which focuses development on the market towns of Leek, Biddulph and Cheadle, and the larger villages, and that this approach facilitates the growth of the towns and larger villages. Policy SS2 specifically states in relation to the Rural Areas large villages that "these are the most sustainable settlements in the Rural Areas".</p> <p>22% of the district's population resides in the four large villages of Cheddleton, Endon, Werrington and Cellarhead, and Blythe Bridge. The population of these villages is nearly double the population of Cheadle, yet these villages only receive a fraction of the housing distribution. The Local Plan states that the redistribution between the Rural Areas and Cheadle is justified as it avoids the need to release Green Belt land, which should only be released in exceptional circumstances. A spatial strategy which ensures the sustainable future of the Rural Areas and its larger</p>	The distribution of housing to Cheadle should be reduced, and the housing in Rural Area larger villages increased to match the levels set out in the Core Strategy.	No		<p>The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas.</p> <p>This approach was considered by the Sustainability Appraisal and was proposed to minimise Green Belt release. The SA's recommended scenario was "growth redirected to towns accompanied by strategic site release"</p> <p>Development in the Cheadle area has been slow but this has been in the absence of a local plan which provides certainty regarding the suitability of sites. The Council is now also taking a more pro-active approach to delivering development and there are signals that the market is improving in the town with progress being made on several large site around the town.</p>	No	

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					<p>villagers which together houses 46% of the district's population constitutes exceptional circumstances. The approach is further unjustified due to Cheadle not having the level of infrastructure required to accommodate the housing distribution proposed.</p> <p>Lastly, past housing delivery rates demonstrate that an approach which seeks to increase housing in Cheadle to this extent is unsound. Table 7.3 in the Plan demonstrates that Cheadle materially underperforms in terms of past housing delivery in comparison with the Rural Areas and the towns of Leek and Biddulph.</p>						
LPS525	Future Provision and Distribution of Development	Policy SS 3	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	<p>No justification has been given as to why 320 dwellings per annum should be provided compared to 330 dwellings per annum. This was also the case in the previous draft of the Local Plan (Preferred Options).</p> <p>The supporting text to the Local Plan identifies that the level of development proposed is as a result of avoiding the need for Green Belt release. However, it is not clear as to how the needs of rural settlements such as Brown Edge (both open market and affordable housing) can be met, either by delivering their needs in a settlement nearby, or not meeting them at all.</p>			No	No	<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build. It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas.</p> <p>This approach was considered by the Sustainability Appraisal and was proposed to minimise Green Belt release. The SA's</p>	No

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										recommended scenario was "growth redirected to towns accompanied by strategic site release"	
LPS458	Future Provision and Distribution of Development	Policy SS 3	Mrs Susan Kneill-Boxley	Office and Publicity Manager CPRE Staffordshire	CPRE (Staffordshire) is supportive of the Local Plan overall and welcome its production. However, they object to the levels of new housing and employment provision included in the Plan and consider that Scenarios E, Eb, F and Fa identified in the 2017 SHMA are preferable to the chosen Strategy. They consider Scenario F as the most appropriate to the circumstances of Staffordshire Moorlands.					<p>The presumption in favour of sustainable development in the NPPF makes it clear that the Local Plan should meet the objectively assessed need for housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the NPPF indicate that development should be restricted.</p> <p>The 2017 SHMA Update identified an objectively assessed need for housing of 235 to 330 homes per year. This assessment was undertaken in line with the National Planning Practice Guidance applying the 2014-based sub national population projections and household projections alongside market signals, the need for affordable housing and economic growth scenarios.</p> <p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF. • The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. 	No
LPS459	Future Provision and Distribution of Development	Policy SS 3	Mrs Susan Kneill-Boxley	Office and Publicity Manager CPRE Staffordshire	As a consequence of Comment LPS458, CPRE (Staffordshire) consider that the level of housing growth identified in the Plan should be reduced to 250 dwellings per annum.					<p>The presumption in favour of sustainable development in the NPPF makes it clear that the Local Plan should meet the objectively assessed need for housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the NPPF indicate that development should be restricted.</p> <p>The 2017 SHMA Update identified an objectively assessed need for housing of 235 to 330 homes per year. This assessment was undertaken in line with the National Planning Practice Guidance applying the 2014-based sub national population projections and household projections alongside market signals, the need for affordable housing and economic growth scenarios.</p> <p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be</p>	No

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										<p>positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build. It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. 	
LPS460	Future Provision and Distribution of Development	Policy SS 3	Mrs Susan Kneill-Boxley	Office and Publicity Manager CPRE Staffordshire	As a consequence of Comment LPS458 and the use of Scenario F, CPRE (Staffordshire) consider that the level of employment provision should be reduced from 27 hectares to around 20 hectares – to balance with a reduction of housing numbers in Comment LPS459.					<p>The presumption in favour of sustainable development in the NPPF makes it clear that the Local Plan should meet the objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the NPPF indicate that development should be restricted.</p> <p>27ha of employment land supports economic growth and dovetails with the preferred housing requirement</p>	No
LPS538	Future Provision and Distribution of Development	Policy SS 3	Muller Property Group		The respondent maintains their support for this policy.					Support noted.	No
LPS435	Future Provision and Distribution of Development	Policy SS 3	Richard House	Gladman	Gladman contends that this policy should express requirements as a minimum, and ensure that these figures are based on robust and credible evidence. The housing requirement should be increased to at least 6,280 net dwellings (330 per year, in accordance with Paragraph 47 of the NPPF. Gladman has seen no justification in the Plan for setting a housing requirement less than the full objectively assessed need.	The housing requirement should be increased to at least 6,280 net dwellings (330 per year) so as to correlate with the top range identified in the 2014 Strategic Housing Market Assessment.	Yes	No	Yes	<p>The requirement is already expressed as a minimum.</p> <p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build. It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be “aspirational, but realistic” when considered in the context of an historic</p>	No

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										<p>average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>Specifically in relation to the low rate of delivery in comparison to commitments, this issue is recognised by the Council. Closer analysis of the unimplemented planning permissions suggests that these sites are generally small sites where only 1 to 5 homes are proposed. There has been a limited number of sites with more significant scale development proposed. It should also be recognised that this period of under delivery coincides with the absence of a Local Plan complete with allocations which will provide greater certainty and opportunities to developers and support investment.</p> <p>Furthermore, the Local Plan allocates a number of strategic sites of a sufficient scale and nature so as to further encourage investment and provide a more diverse housing supply than the District has been afforded historically. 56% of the residual housing requirement is planned to be met on site between 179 and 588 dwellings.</p> <p>Finally, the Council is in the process of implementing a more pro-active approach to housing delivery working with landowners and developers to seek to improve the rate of development.</p>	
LPS544	Future Provision and Distribution of Development	Policy SS 3	Mr Martin Webb		<p>The proposed distribution to the rural areas is too low, and insufficient to meet development needs particularly within the larger villages. No evidence has been provided in terms of need between the settlements. Furthermore, respondent is concerned as to whether the quantum of development proposed within Leek, Biddulph and Cheadle is realistically deliverable.</p> <p>Additionally, of the 461 dwellings to be allocated within the rural area, 300 dwellings are to be provided on one site (Blythe Vale). The distribution around the rural area is extremely uneven, with most villages not accommodating even one site allocation, and consequently their needs will not be met. Blythe Bridge directly adjoins and is effectively a suburb of the city of Stoke-on-Trent. As such, the delivery of the Blythe Vale site would not make any contribution to addressing housing needs in the rural area of Staffordshire Moorlands. The site should therefore not be included within the requirement for the rural areas. It should instead be included within a separate category relating to the city of Stoke-on-Trent. Insufficient housing is being apportioned to the</p>			No	No	<p>The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas.</p> <p>This approach was considered by the Sustainability Appraisal and was proposed to minimise Green Belt release. The SA's recommended scenario was "growth redirected to towns accompanied by strategic site release"</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017)</p>	No

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					rural area.					reiterates this commitment. It is considered there are no exceptional circumstances to justify the further release of land from the green belt. Blythe Bridge is defined as a larger village in the Local Plan as it was in the adopted Core Strategy. The village is located within the rural areas of the District and provides a sustainable location to support growth on land outside of the Green Belt.	
LPS545	Future Provision and Distribution of Development	Policy SS 3	Mr Martin Webb		Respondent has expressed concern over the Council's approach to the Green Belt. Specifically the Council's justification for not allocating sites and meeting development needs within a number of the larger villages due to the presence of the Green Belt. The Council considers there to be exceptional circumstances to justify Green Belt release at a strategic level, and a number of the proposed site allocations involve the release of land from the Green Belt. The respondent considers there are exceptional circumstances to also justify the release of land from the Green Belt around the larger villages, specifically at Biddulph Moor. Additionally, despite releasing land from the Green Belt for development, the Plan does not make any reference to the identification of safeguarded land.			No	No	The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in the policy. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy. The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the further release of land from the green belt.	No
LPS550	Future Provision and Distribution of Development	Policy SS 3	Wainhomes (North West) Limited		The proposed distribution to the rural areas and Cheadle is too low, and insufficient to meet development needs. No evidence has been provided in terms of need between the settlements. Furthermore, respondent is concerned as to whether the quantum of development proposed within Leek, Biddulph and Cheadle is realistically deliverable. Additionally, of the 461 dwellings to be allocated within the rural area, 300 dwellings are to be provided on one site (Blythe Vale). The distribution around the rural area is extremely uneven, with most villages not accommodating even one site allocation, and consequently their needs will not be met. Blythe Bridge directly adjoins and is effectively a suburb of the city of Stoke-on-Trent. As such, the delivery of the Blythe Vale site would not make any contribution to addressing housing needs in the rural area of Staffordshire Moorlands. The site should therefore not be included within the requirement for the rural areas. It should			No	No	The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas. This approach was considered by the Sustainability Appraisal and was proposed to minimise Green Belt release. The SA's recommended scenario was "growth redirected to towns accompanied by strategic site release" The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only	No

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					instead be included within a separate category relating to the city of Stoke-on-Trent. Insufficient housing is being apportioned to the rural area.					<p>be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the further release of land from the green belt.</p> <p>Blythe Bridge is defined as a larger village in the Local Plan as it was in the adopted Core Strategy. The village is located within the rural areas of the District and provides a sustainable location to support growth on land outside of the Green Belt</p>	
LPS469	Future Provision and Distribution of Development	Policy SS 3	Renew Land Development Ltd.		<p>This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at: (1) Newpool Farm, Newpool Road, Knypersley, Biddulph; and (2) Hurst Quarry, Hurst Road, Biddulph.</p> <p>The OAN range proposed in this policy was provided in the SHMA. However, it is considered that this OAN range requires further investigation and clarification before it can be considered sound. With regard to the SHMA update, it does not clarify the reasons why the economic scenarios vary considerably from previous publications of the SHMA. Additionally, it does not explain the reasons for the reduction in the upper end of the OAN range of around 100 dwellings per annum. Furthermore, the most recent SHMA is the first time that Experian forecasts have been used however the SHMA has not sought to provide an assessment using Cambridge forecasts. It is considered that estimates of all of these forecasts should be used in order to determine any consistencies and differences. Also, using Experian forecasts for the first time in the latest update of the SHMA does not allow for any contextual analysis of comparison to previous Experian forecasts.</p> <p>Additionally, the reduction in the annual housing requirement from 330 to 320 has not been justified in the supporting text to this policy. The Local Plan identifies that the level of development proposed is as a result of avoiding the need for Green Belt release. However, the Local Plan does propose some Green Belt amendments in order to release land for development during the plan period.</p>		Yes	No	Yes	<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p>	No
LPS437	Future Provision and Distribution of Development	Policy SS 3	J Weston		<p>Housing numbers for the district and Cheadle are too high.</p> <p>Housing proposed in the north of Cheadle should be reduced and the school should be relocated to a more sustainable area.</p>	Reduce the housing numbers for the district and Cheadle. Additionally, relocate the school in Cheadle.		No	No	<p>The presumption in favour of sustainable development in the NPPF makes it clear that the Local Plan should meet the objectively assessed need for housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or if specific policies in the NPPF indicate that development should be restricted.</p> <p>The 2017 SHMA Update identified an objectively assessed need for housing of 235 to 330 homes per year. This assessment was</p>	No

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										<p>undertaken in line with the National Planning Practice Guidance applying the 2014-based sub national population projections and household projections alongside market signals, the need for affordable housing and economic growth scenarios.</p> <p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build . • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF. • The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p> <p>The approach for Cheadle is supported by the SA.</p>	
LPS464	Future Provision and Distribution of Development	Policy SS 3	Mr Mark Bullock		<p>This representation is submitted on behalf of the landowner of Park Lane, Cheadle (Site CH165) who objects to this policy.</p> <p>The OAN range proposed in this policy was provided in the SHMA. However, it is considered that this OAN range requires further investigation and clarification before it can be considered sound. With regard to the SHMA update, it does not clarify the reasons why the economic scenarios vary considerably from previous publications of the SHMA. Additionally, it does not explain the reasons for the reduction in the upper end of the OAN range of around 100 dwellings per annum. Furthermore, the most recent SHMA is the first time that Experian forecasts have been used however the SHMA has not sought to provide an assessment</p>		Yes	No	Yes	<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build . • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line 	No

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					<p>using Cambridge forecasts. It is considered that estimates of all of these forecasts should be used in order to determine any inconsistencies and differences. Also, using Experian forecasts for the first time in the latest update of the SHMA does not allow for any contextual analysis of comparison to previous Experian forecasts.</p> <p>Additionally, the reduction in the annual housing requirement from 330 to 320 has not been justified in the supporting text to this policy. The Local Plan identifies that the level of development proposed is as a result of avoiding the need for Green Belt release. However, the Local Plan does propose some Green Belt amendments in order to release land for development during the plan period.</p>					<p>with to Paragraph 21 of the NPPF.</p> <ul style="list-style-type: none"> The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p>	
LPS255	Distribution of Development	Table 7.1	John Williams		The respondent argues the Plan is unsound and not legally compliant. This is due to the Council ignoring local residents' objections, allowing the uncontrolled expansion of villages. The respondent also notes the lack of compliance with the SMCD Core Strategy, Churnet Valley Masterplan and Neighbourhood Plans.			No	No	<p>Policy SS11 is largely the same as the approach to the Churnet Valley as the adopted Core Strategy. The policy provides a clear link to the Churnet Valley Masterplan.</p> <p>The Local Plan clearly identifies the strategic policies that emerging neighbourhood plans must be in general conformity with in order to assist their preparation.</p>	No
LPS185	Paragraph	7.29	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	United Utilities have previously explained that a fuller understanding of the impact on 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 chosen points of connection to the public sewerage system and mains water supply.					Comment noted.	No
LPS549	District net housing requirement	Table 7.2	Mr Martin Webb		The allowance for 100 dwellings in the Peak District National Park is not justified. No schedule of sites appears to be present within the evidence base supporting the Plan, including the SHLAA. Whilst the Plan states that this allowance reflects long term annual average housing completions in the parts of the District that lie within the National Park, no specific evidence is actually provided. Furthermore, to actually rely upon such provision to meet the trajectory would conflict with Sections 61 & 62 of the 1995 Environment Act. The Peak District National Park Core Strategy does not allocate sites or set an overall housing target to be achieved over the plan period, due to the potential harm to the National Park which could be caused by having to meet such a target.			No	No	<p>The Local Plan makes an allowance for the completion of 100 dwellings within the District but inside the Peak District National Park up to the year 2031. This is based on past trends for development. It does not relate to a development requirement for the Peak District National Park Authority, but reflects the exceptional approach to development that helps further the purposes and duty on the National Park to have regard to social and economic well-being of its communities.</p> <p>This approach has been agreed with the National Park Authority under the Duty to Co-operate and reflects the fact that the objectively assessed need for housing referred to in SHMA relates to the District as whole. Similar agreements with the National Park Authority are reflected in the recently adopted Local Plans of neighbouring authorities (High Peak and Derbyshire Dales).</p>	No
LPS555	District net housing	Table 7.2	Wainhomes		The allowance for 100 dwellings in the Peak District National Park			No	No	The identified housing requirements for Staffordshire	No

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	requirement		(North West) Limited		is not justified. No schedule of sites appears to be present within the evidence base supporting the Plan, including the SHLAA. Whilst the Plan states that this allowance reflects long term annual average housing completions in the parts of the District that lie within the National Park, no specific evidence is actually provided. Furthermore, to actually rely upon such provision to meet the trajectory would conflict with Sections 61 & 62 of the 1995 Environment Act. The Peak District National Park Core Strategy does not allocate sites or set an overall housing target to be achieved over the plan period, due to the potential harm to the National Park which could be caused by having to meet such a target.					Moorlands includes parts of the National Park. The Peak Park Authority has agreed to an allowance of 100 dwellings being identified in the housing land supply for the Staffordshire Moorlands Local Plan. This allowance reflects long term annual average housing completions in the parts of the District that lie within the National Park. Whilst the Peak District National Park Core Strategy does not allocate land for housing, the allowance will be factored in to the windfall allowance for the District and housing completions and commitments within the National Park will be monitored accordingly. The recently adopted High Peak Local Plan (2016) and Derbyshire Dales Local Plan (2017) both include an allowance for the National Park area.	
LPS387	Paragraph	7.33	Seabridge Developments Limited		The Council has not been able to demonstrate a 5 year housing land supply for some time and its delivery performance is very poor. The NPPF makes clear that Districts that have not consistently been able to demonstrate a deliverable 5 year housing land supply, should include an additional buffer requirement of 20%. The draft NPPF also maintains this. Moreover, the respondent considers that any housing requirement should include a 10% slippage allowance. The Council's stance of making no allowance at all, as set out in this paragraph, is therefore unacceptable and unjustified. The housing requirement should be increased to include a 20% buffer and a 10% slippage allowance to a level that will ensure the Council is able to demonstrate a 5 year housing land supply, throughout the plan period.					5 year supply calculations do include a 20% buffer to reflect historic under delivery. Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances.	No
LPS139		Table 7.4	Mr J Steele		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 remaining 14 years of the plan period.			No	No	The 2017 Employment Land Requirement Study Update assessed the future employment land needs for the District. Note this considered a range of demand and labour supply-led employment land scenarios, and considered factors such as demand for employment land, past take up rates, past losses of employment land, and other factors. The assessment is not based solely on past take up rates.	No
LPS25	Strategic Housing and Employment Land Supply	Policy SS 4	Ms Debbie Evans		The respondent previously put forward a piece of land of around 5 acres for residential development, with a further 12.75 acres to be given to the local community for recreational uses. This is because the respondent felt that an area for recreational uses was greatly needed in Brown Edge. Although the respondent's proposed land was assessed through the various stage of the Local Plan as being acceptable, the Council favoured the other plot within Brown Edge. The respondent's site was considered a 'reserve' site. Despite both plots falling within the Green Belt and the respondent disagreeing with the Council's decision that the other site was better, the respondent still felt that the positive allocation of one of the sites would provide the village with the					The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy	No

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					<p>needed housing for local families. However, the Council has now removed both the preferred and the respondent's 'reserve' sites from the Plan and is instead, it appears, relying on windfall sites to make up the minimum allocation of 25 houses in Brown Edge. The respondent feels that no sensible and rational reason for this decision has been provided by the Council. Windfall sites should only be relied upon when no acceptable sites are proposed.</p> <p>The respondent would be grateful if the Council could investigate and let them know the reasons behind the above decision. The respondent would like to know why the Council has shied away from making a small but bold amendment to the Green Belt boundary in Brown Edge. They would also like to know where the 25 houses are going to be built because the village has minimal brownfield and greenfield sites that are not within the Green Belt or on very steep slopes.</p> <p>The respondent also welcomes comments on whether the two sites in Brown Edge have been dropped for political reasons (protecting the Green Belt to minimise negative comments from opposition political parties) rather than for planning reasons.</p>					<p>H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>It is noted that the respondent has offered an additional area of land to the Council for community recreational use. It is not considered this constitutes exceptional circumstances to justify the release of BE32 from the green belt. This land is also within the green belt.</p>	
LPS50	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Nick Mountford		<p>This representation is written on behalf of the site owner Mr Nicholas Mountford. The respondent feels that this policy is not sound as it only indicates proposed housing figures for broad areas in the District, whereas in the NPPF Paragraph 50 point 2 states that local planning authorities should "identify size type, tenure and range of housing that is required in particular location, reflecting local demand."</p> <p>The respondent highlights the key words from the NPPF: "in particular locations". The respondent feels that Policy SS4 doesn't provide much certainty because it only states figures and percentages for broad areas (the towns and rural areas), and not particular locations. The respondent contends that specific numbers, dwelling types and tenures should be identified for individual villages in the rural areas to ensure that the particular needs of those settlements are met.</p> <p>The respondent further highlights that in Policy SS4 there are no overall housing figures for the larger and small villages. Equally, Policy SS4 does not state figures for the number of affordable houses and/or starter homes required in the villages. The lack of such figures in the Plan makes it difficult to assess whether the proposed allocations in the larger villages will provide sufficient houses (open market and affordable) and the required types of houses and tenure.</p> <p>Respondent refers to the Council's 2015 Site Options public consultation target figures for the number of houses needed in each settlement. In Endon, Werrington and Cellarhead the target</p>	Respondent would like the Council to identify the particular housing needs in each village, including affordable housing needs and provide sufficient housing land to meet these needs.	Yes	No	Yes	<p>To provide precise housing/affordable housing requirements for individual villages would be overly prescriptive and inflexible. Furthermore, affordable housing needs at this level tend to reflect much shorter timeframes than the Local Plan.</p> <p>The figures quoted for settlements in the 2015 Options Consultation were indicative only to provide a rough guide to the extent of possible allocations.</p> <p>The precise mix of housing will be determined on a site by site basis at the application stage reflecting Policy H3, H1 and relevant evidence such as the SHMA and successor documents.</p>	No

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					<p>housing figures for the period of 2011- 2031 were 85 and 200 dwellings respectively. The Submission Version Plan housing allocations in these two villages are 22 and 75, with other provision to be provided by windfall and infill. The scope of windfall and infill is likely to be small, particularly as many possible sites will have been developed or had applications refused in the past. The respondent acknowledges the fact that some housing has been built since 2015 in both villages which will have reduced this figure.</p> <p>Based on Policy H3 the affordable dwelling provision on the allocated sites will be about 7 houses on the Endon sites and 25 on the two Werrington sites. It is written that the allocations in these two villages and in the villages are not sufficient enough to meet both general and affordable housing needs in these settlements.</p> <p>Respondent claims that many of the villages surrounded by the Green Belt or on the edge of the Green Belt are significantly restricted by these constraints. This has the effect of limiting options for new development and affordable housing. Additionally, the types, sizes, tenure and range of housing that are required in the District and in particular locations have not been identified.</p> <p>The lack of specific targets for affordable housing in the individual villages is particularly relevant where affordable housing is concerned. Respondent references the SHMA 2017 (Paragraph 8.16) which identifies a considerable need for affordable housing in the District but it is not clear in the Plan how the particular needs of individual settlements would be met. Respondent highlights how this will result in the particular housing needs of each village not being met. As such, the Plan would not be effective.</p> <p>Respondent refers again to Policy H3, which sets out the requirements for affordable housing and where affordable housing should be provided as part of new development. Respondent uses Endon as an example, where only one site has been allocated for housing. The Council propose 22 houses on this site. Based on Policy H3 the Council hopes to have seven affordable dwellings. Respondent refers to the Housing Needs study in Endon which concluded that there is an immediate need for 10 affordable houses and a further 15 in the next five years. Respondent references Appendix 1 –table showing timescale for housing requirements. Respondent reiterates that the allocated site alone would be insufficient to meet this need as it would be a mixture of open market and affordable housing.</p> <p>Respondent refers to the 2013 housing needs survey for Werrington, which concluded that 54 affordable dwellings were needed in Werrington. Since then, approximately 27 affordable dwellings have been provided in Werrington and Cellarhead, although the seventeen at Cellarhead are in Caverswall parish and the respondent believes that these dwelling were intended to</p>						

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					<p>meet the needs of Caverswall and Dilhorne Parishes. Respondent argues that if the 27 houses are added to the likely 25 affordable dwellings that could be built on the allocated Ash Bank Road sites then the 2013 target would effectively be met. However, if the Cellarhead site is part of the provision of Caverswall and Dilhorne then there would still be a shortfall of about 19 dwellings.</p> <p>In the past, the Council has carried out housing survey needs in the villages, based on the individual parishes. The respondent has noticed that the Council has recently stopped these surveys and now require applicants for affordable housing to carry out parish surveys with Parish Councils. Given that the Council requires information at the Parish level the lack of specific information in the Submission Plan for each rural settlement is inconsistent with the advice in the NPPF and its own approach to housing provision, particularly affordable housing.</p> <p>Respondent summarises that Policy SS4 and its lack of information for particular locations is not sound because it is not consistent with National Policy (referring to the NPPF). It would not be effective as it would not meet affordable housing or general housing needs, particularly in rural areas. Lastly, it is not justifiable because other strategies, for example releasing more land in the larger villages and smaller villages, including the Green belt, may be more effective in meeting affordable housing needs and general housing needs in the villages.</p>						
LPS54	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Peter Cowie		<p>Research in the local press indicates that more than 1,000 houses are standing empty in Staffordshire Moorlands. The Local Authority should investigate ways of incentivising the occupation of these properties rather than building new houses, which has an adverse effect on the unique landscape of Staffordshire Moorlands. Indeed residents were told in 2014 by the Core Strategy that the unique landscape of Staffordshire Moorlands would be protected. The Leader of the Council used this principle of protection in recommending the Core Strategy for approval.</p>			No	No	The Strategic Housing Market Assessment (SHMA) takes into account empty homes within the District. Local Plan spatial objectives promote local distinctiveness by means of good design and the conservation, protection and enhancement of historic, environmental and cultural assets throughout the District (SO8) and conserve and improve the character and distinctiveness of the countryside and its landscape, heritage biodiversity and geological resources (SO9). Local Plan Policy DC3 seeks to protect and where possible enhance local landscape.	No
LPS73	Strategic Housing and Employment Land Supply	Policy SS 4		The Winterton Lodge Partnership	<p>Approximately 10% of the 793 net housing requirement in Rural Areas could be accommodated at the 65 acre Cotton College site.</p> <p>A significant part of the Cotton College site is brownfield land, which could alone make a significant contribution towards the housing requirement. However, the site does not fit any of the proposed categories as it is not located in a Larger Village and is not a small site.</p>	An additional category should be added to Table 7.6 for brownfield development in rural areas. Alternatively, the Cotton College site (or part of it) could be allocated for housing development under Policy H2.	Yes	No	Yes	The figures relate to the Rural Areas as a whole rather than whether they are brownfield or greenfield sites. Policies in the plan provide encouragement for brownfield development in the Rural Areas e.g. Policy SS10.	No
LPS95	Strategic Housing and Employment Land Supply	Policy SS 4	Mr R Thornycroft		<p>This policy identifies a minimum new housing requirement of 1,015 new dwellings in Leek (see Table 7.6). The respondent has not carried out an assessment of the assumed supply arising from committed sites and a windfall allowance of 25 dwellings per annum. However, even on the basis of the Council's figures there appears to be a shortfall of 68 houses identified as being developable through this policy (947 dwellings). The Submission Version Plan will not ensure that the minimum housing requirements of Leek, which is a principal urban settlement in the</p>					<p>Comments relating to Eaton House site noted.</p> <p>It is acknowledged that there is a small shortfall of housing provision in the Leek Area. However, the overall requirements for the District are still met broadly in line with Pol SS3 expectations. Additional housing sites are therefore not required.</p> <p>Subsequent schemes upon this site for the uses suggested</p>	No

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					<p>Borough, will be met over the plan period.</p> <p>The respondent owns a site in Leek (Eaton House, Buxton Road, Leek, ST13 6EG) that could make a meaningful contribution to the identified housing shortfall in Leek (see Comment LPS93). Indeed the respondent's site is enclosed by a committed housing site to the northern boundary (SMD/2014/0561) and another committed housing site to the south-west (SMD/2017/0165). The residential development of the site would therefore integrate well with the surrounding land uses and the adjacent Birch Gardens.</p>					<p>(housing /officing /retail) would be assessed on their merits and applying all other relevant Local Plan Policies (including Pol E3) and NPPF Policy.</p> <p>Note that some of the uses referred to in the representation (eg retail, leisure) are additionally affected by town centre protection policies, and may therefore require a sequential demonstration for their creation when not located in a town centre. Note that the site falls <i>outside</i> of the Leek town centre boundary as defined in map A1.3 of the submission version Local Plan.</p> <p>Proposals to develop the children's day nursery would need to be justified against all applicable Local Plan policies including C1 (loss of community facilities).</p>	
LPS102	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Kenneth Wainman	Ken Wainman Associates Ltd	<p>Policy SS4 is not sound as it only indicates proposed housing figures for broad areas in the District whereas bullet point 2, Paragraph 50 of the NPPF states that local planning authorities should "identify the size type, tenure and range of housing that is required in particular locations, reflecting local demands."</p> <p>The respondent highlights the key phrase "in particular locations" in Policy SS4, which provides figures and percentages for broad areas (the towns and rural areas) instead of particular locations. The respondent contends that specific numbers, dwelling types and tenures should be identified for individual villages in the rural areas to ensure that the particular needs of those settlements are met.</p> <p>There are no overall figures for the larger and smaller villages. Equally, there are no figures for the number of affordable houses and/or starter homes required in the villages. The lack of such figures in the Plan makes it difficult to assess whether the proposed allocations in the larger villages will provide sufficient houses – open market and affordable – and the required types of houses and tenure, and whether the Plan would be effective.</p> <p>The Site Options public consultation in 2015 provided target figures for the number of houses needed in each settlement. In Endon and Werrington & Cellarhead the target housing figures for the period 2011-2031 were 85 and 200 respectively. The Submission Version housing allocations in these two villages were 22 and 75, with other provision to be provided by windfall and infill. However, both villages are surrounded by Green Belt and well-developed so the scope for windfall and infill is likely to be small.</p> <p>Based on Policy H3 the affordable dwelling provision on the allocated sites will be about 7 houses on the Endon site and 25 on the two Werrington sites. However, the allocations in these two villages and in the villages generally, are not sufficient to meet both general and affordable housing needs in these settlements. Indeed a 2013 housing needs survey in Endon concluded that there was an immediate need for ten affordable houses and a</p>	The Plan should identify the size, type, tenure and range of housing that is required in the larger and smaller villages reflecting local demand, and allocate more housing sites in Policy H2 to meet these needs.	Yes	No	Yes	<p>To provide precise housing/affordable housing requirements for individual villages would be overly prescriptive and inflexible. Furthermore, affordable housing needs at this level tend to reflect much shorter timeframes than the Local Plan.</p> <p>The figures quoted for settlements in the 2015 Options Consultation were indicative only to provide a rough guide to the extent of possible allocations.</p> <p>The precise mix of housing will be determined on a site by site basis at the application stage reflecting Policy H3, H1 and relevant evidence such as the SHMA and successor documents.</p>	No

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					<p>further 15 in the next five years. The lack of specific targets for affordable housing provision will result in the particular housing needs of each village not being met. Additionally, the types, sizes, tenure and range of housing that is required in the District and in particular locations is not identified.</p> <p>In summary, this policy is unsound because it is not consistent with national policy, would not be effective in that it would not meet affordable housing needs and is not justified because other strategies such as releasing more land in the larger villages and smaller villages including the Green Belt, may be more effective in meeting affordable housing need and general housing need in the village.</p>						
LPS138	Strategic Housing and Employment Land Supply	Policy SS 4	Mr J Steele		<ul style="list-style-type: none"> Respondent has no confidence in the housing numbers because they have been different in each version of the Plan. This suggests that there is no sound basis for determining the correct numbers. This is the fourth consultation of Plan and the numbers of representations received have decreased significantly. Residents are suffering from consultation fatigue and a sense that the Council do not consider what they have to say. The housing allocations appear to be driven more by the financial aspects of the "new homes bonus" and the generation of Council Tax, rather than by need. The track record of the Council in achieving development is poor in terms of total numbers of houses built, especially affordable houses. There is no evidence to show how this problem will be dealt with. The Plan does not demonstrate how the Council will prevent developers from land banking. The Council appear driven by self-interest, colluding with developers to maximise their profits. The Council do not seek to enter into cooperation with the neighbouring conurbation of Stoke-on-Trent, when there is a lot of brownfield land there, within just a few miles of the District Council boundary. It appears that bureaucracy and land ownership outweigh sustainable development. 			No	No	<p>The housing requirement has been updated during the preparation of the plan to take account of new household projections as required by the planning practice guidance.</p> <p>The Council has engaged with Stoke-on-Trent City Council regarding housing provision and they are unable to accommodate any of the District's housing needs at present.</p> <p>Housing delivery is projected to increase as set out in the housing trajectory. This will be assisted by the certainty that the plan provides in terms of site allocations and the Council adopting a more pro-active approach to housing delivery.</p>	No
LPS167	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Yendole	Forward Planning Stafford Borough Council	<p>The housing and employment growth proposed in the Blythe Vale development is additional to that set out in the District overall. As such, the reference to employment should be complemented by an additional reference to housing as part of the justification text associated with Policy SS4. It is noted that reference is made to the housing allocation as part of the wider mixed use development at Blythe Vale in Policy H2.</p> <p>Stafford Borough Council also welcome the opportunity to enter into a Statement of Common Ground with SMDC for submission of the Local Plan.</p>					<p>Housing growth at Blythe Vale contributes towards the plan requirement. Employment growth at the site does not as this reflects the Regional Investment Site.</p>	No
LPS174	Strategic Housing and	Policy SS	David		C Nixon & Partners of Forsbrook have previously made					Both BB042 and BB043 are in the green belt and were classed as	No

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	Employment Land Supply	4	Nixon		<p>representations in relation to the consultation exercise of the draft Local Plan. In those representations, they challenged the Council's proposed settlement strategy and excessive reliance upon the three towns and Blythe Vale for housing provision. They are concerned whether the housing provision can be delivered.</p> <p>By concentrating on these settlements, the Council is basing its reliance for delivery upon a limited number of national house builders. The reliance on Blythe Vale is particularly unsound because it is a greenfield site currently lacking infrastructure. Additionally, the delivery period for the similar Trentham Lakes projects by St Modwen extended over twenty years while their related development of the old Stoke City football ground has taken the same twenty years to reach the detailed planning stage.</p> <p>The expectation for Blythe Vale to cater across a range of household types is equally unsound. Blythe Vale is not contiguous with the village settlement and the roads on which it depends act as a separation from the village and its facilities. It will be car dependent and as such will not cater for special needs groups or the growing number of households over 65. This is specifically called for under the 2015 Guidelines for the assessment of housing and economic development needs. Such requirements could be met by a modest expansion of the Blythe Bridge/Forsbrook settlement.</p> <p>In their previous representation, C Nixon & Partners of Forsbrook suggested that sites BB042 and BB043 could make a meaningful contribution to both housing needs and numbers, yet there has been no recognition of this potential. This is despite (1) being capable of early development with an existing infrastructure (see MGF 015); (2) offering non-car dependent circulation (see MGF 016) which includes pedestrian travel distances to village facilities of 400m and, more particularly, pedestrian routes to the local schools which are shorter and safer than any other site; and (3) the opportunity of creating a new, proper and enduring settlement edge (see MGF 022). They would like the full details of their proposal to be made available to the Inspector.</p> <p>Although development of BB042 and BB043 would involve an expansion of the settlement edge, there is an increasing concern nationally and locally that Green Belt boundaries have been drawn too tightly and that the release of some areas for development could take place without undermining the purposes of the Green Belt or causing unacceptable harm to the character and appearance of the surrounding area. The Council's rigid stance in this respect is unsound and a blanket denial of the needs of rural communities to incorporate a range of development ingredients to maintain their social, economic and environmental fabric. Adjustments have been dismissed on the basis of broad designations and there has been no consideration of setting long term boundaries (Paragraph 83 of the NPPF), no opportunities for good urban form or no opportunities to enhance the beneficial use of the Green Belt (Paragraph 82 of the NPPF). All of these aspects were demonstrated in C Nixon &</p>					<p>C sites in the SHLAA.</p> <p>They were not considered suitable for development. They were identified in the Landscape and Settlement Character Assessment (2008) as important to the landscape setting of Blythe Bridge. The Green Belt Study assessed the parcel of land to the north of Forsbrook (parcel S10) and found it made a contribution to the following green belt purposes: checking the unrestricted sprawl of large built-up areas, to assist in safeguarding the countryside from encroachment and to assist urban regeneration by encouraging the recycling of derelict/urban land.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	

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					<p>Partners of Forsbrook's submission (see MGF 005 and photos P1-P6). Additional benefits were a new pedestrian/cycle greenway and the reinforcement of Green Infrastructure by linking habitat sites (see MGF 006). The submission also accords with earlier Green Belt Assessment studies.</p> <p>In conclusion, the Plan has not been prepared on the basis of a strategy that will meet objectively assessed development and infrastructure requirements, particularly for the rural settlements. It has not been positively prepared and considered other reasonable alternatives. C Nixon & Partners of Forsbrook question the deliverability of the development identified in the Plan over its period.</p> <p>C Nixon & Partners of Forsbrook have attached their previous representation to the Preferred Options Plan, which they would like to be made available to the Inspector.</p>						
LPS180	Strategic Housing and Employment Land Supply	Policy SS 4	Mr N Weaver, Mrs B D Eastwood, Mr R Weaver and Mr P Weaver		<p>The Council proposes the delivery of a total of 2,847 dwellings, with a total windfall allowance of 1,070 dwellings during the plan period. As such, the windfall allowance will make up approximately 27% (i.e. a significant proportion) of the total proposed housing supply. In total, this would equate to 3,917 dwellings, which is 58 dwellings more than the identified minimum requirement identified in Policy SS4 (if all of the proposed allocations and windfall sites were to come forward). This would equate to an extremely small buffer of just 1.5%. Yet the Core Strategy identified a slippage allowance of 10% of the housing requirement for each area to allow flexibility and support. This was based on an assumption that 10% of sites would not come forward as anticipated.</p> <p>It is of the respondent's view that the level of flexibility proposed in insufficient to ensure that the housing requirement identified by the Council would be met in the plan period. As such, the current strategy does not identify sufficient sites to deliver housing for it to be considered 'positively prepared' and sufficiently 'flexible' in accordance with the NPPF. This raises concern regarding the ability of the Plan to meet the tests of soundness.</p> <p>Guidance, including that prepared by the Local Plan's Expert Group (LPEG) recommends that a 20% buffer in housing targets is appropriate to ensure housing delivery and to account for any slippage in deliverable sites or targets. Respondent recommends that this level of buffer should be incorporated in the Staffordshire Moorlands Local Plan. In order to provide this 20% buffer, the Local Plan should allocate sufficient land to accommodate 772 dwellings in excess of the minimum requirement identified by the LPA of 3,859 (i.e. a total of 4,631 dwellings).</p> <p>The Council has also not, to the respondent's knowledge, provided a comprehensive list of the sites with planning permission which form part of its supply or any evidence to</p>			No		<p>5 year supply calculations do include a 20% buffer to reflect historic under delivery.</p> <p>Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances.</p> <p>The housing trajectory is informed by permissions and details of proposed allocations in the Local Plan.</p>	No

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					<p>support the significant proportion of the housing requirement that is proposed to be met by windfall sites. The NPPF states that LPAs may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The respondent feels, fundamentally, that the deliverability and soundness of the Plan with regards to housing deliverability would be enhanced by the residential allocation of the former Knypersley Garden Centre site, which could add in the region of 30 deliverable dwellings to the housing target.</p>						
LPS271	Strategic Housing and Employment Land Supply	Policy SS 4	Ollerton Estates LLP and Staffordshire County Council (SCC)		The proposed new sources of housing from 2017 appear sensible. However, Ollerton Estates and Staffordshire County Council question the overall provision of 980 units in Leek because it would not meet the overall net need identified in the town of 1,015 units. Clarification is therefore sought from the Council.			Yes		<p>Comments noted. The NPPF requires that Councils preparing Local Plans can demonstrate they satisfy their OANs as a whole. Policy SS4 sets out broadly how housing requirements for the four areas of the District (Leek / Biddulph / Cheadle / Rural areas) will be satisfied in line with Policy.</p> <p>It is acknowledged that there is a small shortfall of housing provision in the Leek Area. However, the overall requirements for the District are still met. Consideration of specific sites is not relevant to Policy SS4.</p>	No
LPS279	Strategic Housing and Employment Land Supply	Policy SS 4	Dean Lewis Estates		<p>The windfall allowance that amounts to 1,070 dwellings should be eliminated from the components of supply identified in this policy. This would mean that 100% of the total residual housing target of 3,859 would be identified as allocated land within the Plan, thereby following a plan led approach consistent with the NPPF. A further necessary policy approach is to identify land in excess of the Plan target to provide a contingency to the potential failure of the Plan. Respondent reiterates this through reference to the 2016 Local Plans Expert Group 'Report to Government'.</p> <p>See Comment LPS278. Staffordshire Moorlands planning consent implementation and lapse rates are far worse than the national average. The respondent therefore recommends that as large a contingency as possible be required to be instituted into the Plan to ensure timely delivery of the full OAN. They consider that around 30-40% additional land needs to be identified as allocated land to enable the Plan to recover from the current severe position of deficit and to provide a deliverable portfolio of opportunity's during the lifetime of the Plan.</p>			No		<p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:</p> <p>Leek</p> <p>Large windfall allowance (15 per year) = 210.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Biddulph</p> <p>Large windfall site allowance (20 overall) = 20</p> <p>Not many brownfield opportunities identified so figure of 20 considered appropriate.</p>	No

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										<p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.</p> <p>Cheadle</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p> <p>Finally, to allocate the entire residual requirement and still support windfall when there is a clear track record of such sites coming forward is more likely to lead to over development and poor planning in terms of infrastructure provision in particular.</p>	
LPS309	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Gez Willard	Willardwillard Ltd	The figures set out in this policy should be revised in line with the suggestion set out in Comment LPS308.					<p>Sufficient land has been identified to accommodate the identified needs through commitments, allocations and windfall allowance. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle.</p> <p>The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing.</p> <p>In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the</p>	No

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										top of the OAN range.	
LPS341	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Martin Webb		The respondent argues the Council has a significant shortfall in their 5 year housing supply which equates to 1.99 years, substantially below the Framework's minimum requirement of a 5 year housing supply.			No	No	The Local Plan will provide a five year supply whilst recognising past under delivery with a 20% buffer as required by the NPPF.	No
LPS348	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Paul Hill	RPS Planning & Development	It is considered that the Council's reliance on windfall allowance will result in uncertain housing delivery. Paragraph 48 of the NPPF states that there needs to be compelling evidence of such windfalls. Whilst it is possible the Council may in advance of the Examination of the Local Plan through a Housing Background Paper provide further justification, at present this appears to be lacking and thereby falls short of the compelling evidence as required by the NPPF.	Compelling evidence needs to be provided to demonstrate that windfalls will come forward during the plan period.		No		<p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:</p> <p>Leek</p> <p>Large windfall allowance (15 per year) = 210.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Biddulph</p>	No

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										<p>Large windfall site allowance (20 overall) = 20</p> <p>Not many brownfield opportunities identified so figure of 20 considered appropriate.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.</p> <p>Cheadle</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of</p>	

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										the villages.	
LPS377	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Christopher Howle		This policy seeks to identify a potential provision of 890 dwellings (including 730 dwellings to come forward via new allocations) to be provided within Biddulph, alongside a provision of 980 dwellings for Leek, 1,166 dwellings for Cheadle and 881 dwellings in the rural area. However, these figures when combined fall below the OAN figure of 330 dwellings per year. This approach is considered unsound because the latest evidence of housing need contained within the updated Strategic Housing Market Assessment has not been followed through to the Submission Version Plan with the Council instead failing to objectively justify the lower housing figure that is now proposed.			No		<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF. The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>Furthermore, with a pro-active approach to delivery taken by the Council, the requirement is considered to be "aspirational, but realistic" when considered in the context of an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF.</p> <p>The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.</p>	No
LPS388	Strategic Housing and Employment Land Supply	Policy SS 4	Seabridge Developments Limited		With regard to Comments LPS385 and LPS387, the respondent objects to the Biddulph entries in Table 7.6.	The housing land supply should be increased to match that of Cheadle (25%). The entries for Biddulph at Tables 7.7 and 7.8 should also be increased, accordingly.		No	No	Increasing the requirement for Biddulph would necessitate further Green Belt release. The Council does not consider that exceptional circumstances exist for this as the Local plan requirement as a whole can be met without further release in Biddulph.	No
LPS416	Strategic Housing and Employment Land Supply	Policy SS 4	Wainhomes (North West) Limited		The respondent argues the Council has a significant shortfall in their 5 year housing supply which equates to 1.99 years, substantially below the Framework's minimum requirement of a 5 year housing supply.			No	No	5 year supply calculations do include a 20% buffer to reflect historic under delivery. The plan takes account of under supply since 2012 in determining the net housing requirement. The housing trajectory seeks to significant boost the supply of housing land in line with the NPPF.	No

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LPS505	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Grant Anderson	Fradley Estates	<p>Fradley Estates (FE) object to this policy in respect of the distribution of development to Cheadle and the Rural Areas. 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 Rural Areas of 180 units and an increase in the distribution to Cheadle of 180 units (i.e. a change of 360 units). The policy fails the test of soundness, and the approach is not justified as being the most appropriate strategy when considered against reasonable alternatives.</p> <p>The strategy proposed in this policy will significantly lower the amount of housing to come forward in the Rural Areas. This is contrary to the Spatial Vision of the Plan which seeks to create “sustainable and balanced urban and rural communities”.</p> <p>Furthermore, it prejudices the Vision for Rural Areas, in particular the Larger Villages which the Local Plan states “will be the rural centres for services, facilities and jobs acting to sustain the rural areas”.</p> <p>Additionally, this policy is inconsistent with Policy SS2, which states that the Local Plan seeks to carry forward the development approach from the Core Strategy which focuses development on the market towns of Leek, Biddulph and Cheadle, and the larger villages, and that this approach facilitates the growth of the towns and larger villages. Policy SS2 specifically states in relation to the Rural Areas large villages that “these are the most sustainable settlements in the Rural Areas”.</p> <p>22% of the district’s population resides in the four large villages of Cheddleton, Endon, Werrington and Cellarhead, and Blythe Bridge. The population of these villages is nearly double the population of Cheadle, yet these villages only receive a fraction of the housing distribution. The Local Plan states that the redistribution between the Rural Areas and Cheadle is justified as it avoids the need to release Green Belt land, which should only be released in exceptional circumstances. A spatial strategy which ensures the sustainable future of the Rural Areas and its larger villagers which together houses 46% of the district’s population constitutes exceptional circumstances. The approach is further unjustified due to Cheadle not having the level of infrastructure required to accommodate the housing distribution proposed.</p> <p>Lastly, past housing delivery rates demonstrate that an approach which seeks to increase housing in Cheadle to this extent is unsound. Table 7.3 in the Plan demonstrates that Cheadle materially underperforms in terms of past housing delivery in comparison with the Rural Areas and the towns of Leek and Biddulph.</p>	The distribution of housing to Cheadle should be reduced, and the housing in Rural Area larger villages increased to match the levels set out in the Core Strategy.		No		<p>The Local Plan seeks a 3% reduction in the proportion of housing development in the Rural Areas. The Larger Villages in particular are still recognised as having an important role to play in housing delivery with land allocated for 461 homes in addition to a windfall allowance for 420 across the rural areas.</p> <p>This approach was considered by the Sustainability Appraisal and was proposed to minimise Green Belt release. The SA’s recommended scenario was “growth redirected to towns accompanied by strategic site release”</p> <p>Development in the Cheadle area has been slow but this has been in the absence of a local plan which provides certainty regarding the suitability of sites. The Council is now also taking a more pro-active approach to delivering development and there are signals that the market is improving in the town with progress being made on several large site around the town.</p>	No
LPS510	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Grant Anderson	Fradley Estates	<p>Fradley Estates (FE) object to this policy because approximately half of the housing in the Rural Areas (where approximately half of the overall population of the District live) is to be achieved on windfall sites. This approach cannot be considered ‘positively prepared’ or in accordance with the NPPF. It is also not justified when considered against an approach which identifies a range of</p>	The Plan should identify additional housing allocations for the Rural Areas in the largest villages. FE’s site at Langton Court/Tregaron Court		No		<p>The plan seeks to only release Green Belt when there are exceptional circumstances.</p> <p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such</p>	No

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					<p>allocated sites to meet the identified needs.</p> <p>The sites that come forward under the limited infilling approach, in accordance with Policy H1, will be very small. As such, this approach is unlikely to make a material contribution to the provision of housing in Rural Areas, particularly affordable housing. This is despite the Plan identifying a "high need" in section 4.</p> <p>Furthermore, a strategy that is so reliant (to the extent of 50%) on infill proposals delivering its housing provision will fail to contribute towards the infrastructure required to deliver sustainable communities. The Local Plan should, instead, identify additional housing allocations for the Rural Areas in the largest villages. This will enable the Plan to deliver the necessary development to sustain the future of rural communities. The approach will also facilitate the delivery of more affordable housing and infrastructure, as larger allocated sites will be far better placed to make a meaningful contribution to affordable housing and community infrastructure.</p> <p>Werrington, Cheddleton and Blythe Bridge are the largest villages (in terms of their size and facilities) where the majority of development for the Rural Areas should be allocated. The Local Plan proposes an allocation of 75 dwellings for Werrington. However, given the size and facilities of Werrington, it is capable of accommodating a much greater share of the rural housing distribution. As such, FE's site at Langton Court/Tregaron Court (WE042 and WE042) should be allocated for housing under Policy H2.</p>	(WE042 and we043) should be allocated for housing.				<p>sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on</p> <p>small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p>	
LPS526	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	<p>The respondent objects to Policy SS4 for the following reasons:</p> <ul style="list-style-type: none"> The Policy identifies that the previous 10% slippage allowance for non-delivery is not being continued, despite this approach being adopted as recently as 2014 within the Core Strategy. No evidence has been provided in support of the Plan to justify a departure from the previously adopted approach. The only reason that the LPA is discontinuing the slippage allowance is to protect the Green Belt. Such reasoning is not considered to be justified and the Council is mixing up two stages of methodology. The purpose of the slippage allowance is to ensure that housing supply is robust as it recognises that not all 			No	No	<p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:</p>	No

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					<p>sites in the supply chain will come forward within estimated timescales.</p> <ul style="list-style-type: none"> The implementation of a slippage allowance does not automatically mean that pressure for Green Belt release arises as a result. If the LPA is failing to deliver its housing requirement, then the LPA will need to consider applications in the context of the presumption in favour of sustainable development. The respondent includes some figures illustrating Staffordshire Moorlands' delivery rate. They show that the adopted strategy is failing to deliver a sufficient quantum of housing development. A slippage allowance is therefore considered to be justified. The housing numbers afforded to large villages and the small sites allowance is not considered realistic or justified by evidence. Based on their review of the SHLAA (which is out of date) they can only see evidence to suggest that larger villages (including Brown Edge) can deliver 229 dwellings within their defined settlement boundaries, and 42 in smaller villages. This amounts to a total of 271 dwellings, so there is still a need to find land for 149 dwellings in the Rural Areas. Limited infilling" is not defined within national policy, nor is it proposed to be defined under Policy H1 of the Local Plan, which in Green Belt terms, simply directs the decision maker towards national Green Belt policy. Therefore, any proposals for such development will require the decision maker (i.e. the LPA) to make a planning judgement in each and every case, therefore the amount of development that could be delivered under an "infill" policy cannot be accurately gauged, nor is the delivery of such sites guaranteed. The supporting text to Policy SS4 also identifies that the Council has prepared a housing trajectory, and this is provided at Appendix 7 of the Submission Version Plan. The housing trajectory does not appear to be supported by an up to date SHLAA assessment. Furthermore, the SHLAA does not provide a detailed analysis of build out rates for large and small sites depending upon whether they have full or outline permission, or whether there is a resolution to grant planning permission, nor does the SHLAA contain an analysis of build out rates and lead in times for sites that are currently under construction in order to provide an understanding as to whether or not anticipated lead in times and build out rates are robust and are accurately reflected within the trajectory. Whilst the revised Framework has yet to be published, and the examination of the Staffordshire Moorlands Local Plan will be conducted under the current Framework, the revised definition of "deliverable" sites in any revised Framework will have ramifications on determining the 5 year housing land supply of the authority once the new Local Plan is adopted. Unless the LPA can robustly demonstrate that the sites it proposes to allocate, along with existing commitments, can achieve a 5 year housing land supply upon 					<p>Leek</p> <p>Large windfall allowance (15 per year) = 210.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Biddulph</p> <p>Large windfall site allowance (20 overall) = 20</p> <p>Not many brownfield opportunities identified so figure of 20 considered appropriate.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.</p> <p>Cheadle</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p> <p>A pro-active approach to delivery is now being taken by the Council. The housing requirement is considered to be "aspirational, but realistic" when considered in the context of</p>	

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					adoption, then the publication of the revised Framework and its revised definition would mean that the relevant housing land supply policies of the new Local Plan would quickly be considered to be out of date.					an historic average delivery rate of 178 homes per year. An increase in annual average delivery from 178dpa to 320dpa is considered to "boost significantly" the supply of housing as required by para. 47 of the NPPF. The requirement is also deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, does not give rise to significant landscape or heritage impacts, including on the setting of the Peak District National Park. Finally, it closely aligns to a balanced range of social, economic and environmental effects for the top of the OAN range as set out in the Sustainability Appraisal.	
LPS539	Strategic Housing and Employment Land Supply	Policy SS 4	Muller Property Group		The respondent maintains their support for this policy.					Support noted.	No
LPS438	Strategic Housing and Employment Land Supply	Policy SS 4	Richard House	Gladman	<p>The Plan fails to adequately demonstrate how the net housing requirement will be delivered. At least 10% of commitments do not get delivered yet no lapse rate has been applied. Additionally, for some settlements such as Leek and Biddulph, the Local Plan is unclear as to how the housing requirement can be delivered over the plan period. Table 7.4 (assume Table 7.6 of the Submission Version Plan) identifies a net housing requirement for the Leek sub area of 1,015 dwellings based on it accommodating 30% of the District total. However, according to Table 7.5 (refer to Preferred Options Plan) the potential new dwellings from new allocations, large windfall sites and small sites is only 947, a shortfall of 68 dwellings (refer to Preferred Options Plan).</p> <p>It is also unclear as to the contribution to the provision of new dwellings that Neighbourhood Plans are expected to deliver. For example, Policy SS4 states that the housing requirement for the Neighbourhood Plan for Biddulph Parish will be a minimum 900 dwellings (905 in the Submission Version Plan), although Table 7.5 (refer to Preferred Options Plan) indicates a total provision of 885 dwellings for Biddulph.</p> <p>Gladman consider that the Plan will need to deliver additional housing over the plan period. A wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.</p>	The Plan should incorporate a 10% slippage allowance, thus increasing the net housing requirement.	Yes	No	Yes	<p>It is acknowledged that in relation to monitoring data from 31 March 2017, there is small deficit in housing provision in the Leek area.</p> <p>Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for</p> <p>the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the</p> <p>housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances.</p> <p>The Biddulph Neighbourhood Plan area should support 905 dwellings as set out in Policy SS4. This includes the 890 set for the town of Biddulph with the remainder falling within the Rural Areas e.g. Biddulph Moor.</p>	No
LPS547	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Martin Webb		Respondent expresses concern in relation to the proposed windfall/small site allowances. There is insufficient evidence to support the proposed windfall/small site rates.			No	No	<p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of</p>	No

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										<p>such provision since 2006 as follows:</p> <p>Leek</p> <p>Large windfall allowance (15 per year) = 210.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Biddulph</p> <p>Large windfall site allowance (20 overall) = 20</p> <p>Not many brownfield opportunities identified so figure of 20 considered appropriate.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.</p> <p>Cheadle</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p>	
LPS548	Strategic Housing and	Policy SS	Mr		The evidence base provides no assessment in relation to the likely			No	No	Historically there have been losses, particularly in the Leek area	No

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	Employment Land Supply	4	Martin Webb		level of demolitions throughout the plan period. An assessment is therefore required as to how many demolitions are likely to take place, and this should be factored into the amount of land that needs to be allocated moving forward. A simple comparison of the past gross and net completion data indicates that there have been 125 demolitions/losses in the past 10 years (12.5 per annum).					due to plans to redevelop existing residential sites. The Local Plan Submission version does not propose land where wholesale demolition is required to support housing growth.	
LPS552	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Martin Webb		Respondent expresses concern in relation to the proposed windfall/small site allowances. There is insufficient evidence to support the proposed windfall/small site rates.			No	No	<p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:</p> <p>Leek</p> <p>Large windfall allowance (15 per year) = 210.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Biddulph</p> <p>Large windfall site allowance (20 overall) = 20</p> <p>Not many brownfield opportunities identified so figure of 20 considered appropriate.</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.</p>	No

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										<p>Cheadle</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p>	
LPS551	Strategic Housing and Employment Land Supply	Policy SS 4	Wainhomes (North West) Limited		The evidence base provides no assessment in relation to the likely level of demolitions throughout the plan period. An assessment is therefore required as to how many demolitions are likely to take place, and this should be factored into the amount of land that needs to be allocated moving forward. A simple comparison of the past gross and net completion data indicates that there have been 125 demolitions/losses in the past 10 years (12.5 per annum).		No	No		Historically there have been losses, particularly in the Leek area due to plans to redevelop existing residential sites. The Local Plan Submission version does not propose land where wholesale demolition is required to support housing growth.	No
LPS470	Strategic Housing and Employment Land Supply	Policy SS 4	Renew Land Development Ltd.		<p>This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at: (1) Newpool Farm, Newpool Road, Knypersley, Biddulph; and (2) Hurst Quarry, Hurst Road, Biddulph. They object to this policy because no evidence has been provided to justify the omission of the 10% slippage allowance in the supporting text. SMDC have not justified their approach for monitoring housing land supply and why the slippage allowance in the Core Strategy is not flexible. The 10% slippage allowance ensures that the LPA can realistically plan for additional development in order to allow for the provision of a flexible and responsive supply of land. The only reason SMDC is discontinuing the slippage allowance is to protect the Green Belt. Such reasoning is not considered justified.</p> <p>The Council currently only has a deliverable supply of 1.99 years (as of 31 March 2017), and a 20% buffer is applicable given the persistent under-delivery of housing in the area.</p> <p>It is considered that the removal of Site BD063a (amongst other sites) as a housing allocation and its replacement with land adjacent to Wharf Road is not justified by the evidence base. It has previously been demonstrated that the site is otherwise suitable for allocation for housing development and needed to meet the housing requirements established under Policy SS4. The additional land to the west at Newpool Farm is also being promoted as a potential extension to a proposed housing allocation in this location, as is the site at Hurst Quarry for housing development.</p>		Yes	No	Yes	<p>5 year supply calculations do include a 20% buffer to reflect historic under delivery.</p> <p>Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances.</p>	No

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LPS471	Strategic Housing and Employment Land Supply	Policy SS 4	Renew Land Development Ltd.		This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at: (1) Newpool Farm, Newpool Road, Knypersley, Biddulph; and (2) Hurst Quarry, Hurst Road, Biddulph. They object to this policy. With regard to the number of dwellings to be provided in Cheadle by way of the small sites allowance, 10 dwelling per annum is not considered realistic or justified by the evidence.		Yes	No	Yes	Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas). Allowances included in the plan are supported by an analysis of such provision since 2006 as follows: Cheadle Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.	No
LPS475	Strategic Housing and Employment Land Supply	Policy SS 4	Renew Land Development Ltd.		This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at: (1) Jacksons Nurseries/Levens, Biddulph; (2) the former Meadows School, Biddulph (which adjoins the previously mentioned site); and (3) Cheadle Road, Upper Tean. They support this policy through the allocation of sites (1) and (3) mentioned above.		Yes	Yes	Yes	Comment noted.	No
LPS465	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Mark Bullock		This representation is submitted on behalf of the landowner of Park Lane, Cheadle (Site CH165) who objects to this policy. This is because no evidence has been provided to justify the omission of the 10% slippage allowance in the supporting text. SMDC have not justified their approach for monitoring housing land supply and why the slippage allowance in the Core Strategy is not flexible. The 10% slippage allowance ensures that the LPA can realistically plan for additional development in order to allow for the provision of a flexible and responsive supply of land. The only reason SMDC is discontinuing the slippage allowance is to protect the Green Belt. Such reasoning is not considered justified. The Council currently only has a deliverable supply of 1.99 years (as of 31 March 2017), and a 20% buffer is applicable given the persistent under-delivery of housing in the area.		Yes	No	Yes	5 year supply calculations do include a 20% buffer to reflect historic under delivery. Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances	No
LPS466	Strategic Housing and Employment Land Supply	Policy SS 4	Mr Mark Bullock		This representation is submitted on behalf of the landowner of Park Lane, Cheadle (Site CH165) who objects to this policy. With regard to the number of dwellings to be provided in Cheadle by way of the small sites allowance, 10 dwelling per annum is not considered realistic or justified by the evidence.		Yes	No	Yes	Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30%	No

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										<p>in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:</p> <p>Cheadle</p> <p>Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p>	
LPS84	Anticipated Housing Provision	Table 7.7	Mr T A J Campbell		<p>The net housing requirement listed for Cheadle is not going to be met by the three sites now allocated for residential development. For the Plan to be positively prepared, justified and effective there needs to be a re-examination of the housing requirement for Cheadle bearing in mind the government's wish to see the planning system deliver substantially more dwellings than in the past. The logical solution would be to extend the Mobberley Farm allocation further to the south into SHLAA site CH093, after removing the land from the Green Belt. Given the limited contribution the site generally makes to the five purposes of Green Belt (as set out in Paragraph 80 of the NPPF) and the sustainable location of this site, this would be a justified response to the historically low levels of new housing in the town.</p>	<p>The Mobberley Farm residential allocation should be extended further south, into SHLAA site CH093. This would make the Plan positively prepared with regard to the housing situation in Cheadle.</p>	Yes	No	Yes	<ul style="list-style-type: none"> CH093 was considered as part of the Green Belt Review Study and the overall impact of development on the purposes of the Green Belt was considered to be moderate. <ul style="list-style-type: none"> Check unrestricted sprawl – contribution Prevent towns merging – limited contribution Safeguarding from encroachment – contribution Setting of towns – contribution The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances and although concludes that it could be considered for release, exceptional circumstances would need to be justified. The Landscape, Local Green Space and Heritage Impact Study considers the site to be of high landscape sensitivity. Some screening is provided by woodland to the south, particularly when viewed from the A522, however the land rises up from the woodland and visual prominence increases. The site does not fit well within existing settlement pattern and development of the site would adversely affect the existing settlement pattern and edge, and encroach on countryside. It is considered that there are no exceptional circumstances to justify amendment of the Green Belt boundary in this location. There are other housing sites available in Cheadle not located in the Green Belt. 	No
LPS143	Paragraph	7.40	Mr J Steele		<p>The Area Strategies (Leek, Biddulph and Cheadle) fail to recognise the looming changes in retail business. High streets are under threat from online purchasing yet SMDC are seeking to increase business rates, at the same time as charging more for parking.</p>			No	No	<p>Business rates and parking charges are outside the remit of the Local Plan. The Local Plan contains policies to ensure the long term vitality and viability of Leek, Cheadle and Biddulph town centres (Policies TCR1, TCR2 and TCR3).</p>	No
LPS18	Leek Area Strategy	Policy SS 5	Mr John		<p>Respondent draws attention to two bullet points found in this policy starting "Protecting, increasing and improving the provision and accessibility of open..." and "Promoting measures to encourage walking and cycling". The respondent states that the</p>	<p>The idea to develop along The Mount and the western side of Leek (along Macclesfield Road) should be</p>	No	No		<p>The public open spaces / Local Green Spaces proposed by the Council are those mapped in the Submission version Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent</p>	No

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			Pigott		Local Plan has not considered this policy because no assessment or comment has been made about the amenity value of The Mount (in Leek) in terms of the number of people who walk or jog around it. Many people walk directly from their homes into the rural location with fine views over Leek and more distant hills. Respondent fears that if the housing estate is built and Mount Road becomes an estate road, then the amenity will be lost as many people will not want to walk along a busy road. The respondent feels that this is an issue that has been raised by hundreds of people over the various consultations yet no assessment has been carried out by the planners.	rejected.				<p>with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>Mount Road is a vehicular highway. The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022 /LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate). Leek is already served by a number of frequent or less frequent bus routes, connecting to centres such as Hanley, Cheadle, Buxton and Macclesfield. A number of these use main arterial routes such as Buxton Road/Ashbourne/Springfield Road. In some circumstances, major residential developments may be required to contribute to improved bus routes/bus facilities in accordance with Local Plan Pol T1/SM Integrated Transport Strategy.</p> <p>The Council uses evidence to justify its selection of 'Preferred' allocation sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The Green Belt Review did not recommend site LE103 off the Macclesfield Road, for release from Green Belt given its contribution to Green Belt purposes (in the NPPF). More generally it concluded that land parcels N6, N15 and N16, all made a contribution to overall Green Belt purposes.</p>	
LPS268	Leek Area Strategy	Policy SS 5	Ollerton Estates LLP and Staffordshire County Council (SCC)		The Leek Area Strategy is welcomed by the landowners of LE066, LE128a&b and LE140.			Yes		Support for inclusion of these sites, and later development statement, noted.	No
LPS281	Leek Area Strategy	Policy SS 5	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>With regard to Policy SS5, section 4 is particularly welcomed for its recognition of the contribution that heritage assets make to</p>	Historic England recommend the following amendment (changes shown in bold) to the first bullet point under section 4 of this policy: "...including heritage assets and their setting ,				This wording is contained in Policy DC2 'The Historic Environment' and it is not considered necessary to repeat it in this policy as the plan should be read as a whole.	No

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					<p>tourism. However, the first bullet point in this section should additionally make reference to the setting of heritage assets, because setting can notably affect the significance and appreciation of an asset (reference made to Paragraph 132 in the NPPF).</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>	complemented by new distinctive..."					
LPS294	Leek Area Strategy	Policy SS 5	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England note that the 'Landscape, Green Space and Heritage Impact Study' noted the need for additional heritage assessment work on site to inform any new development. If this work has not been done already as part of the Local Plan and site allocation process, it would be advisable to include the need for this as a policy for the site.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>					Policy SS5 includes this information.	No
LPS417	Leek Area Strategy	Policy SS 5	Wainhomes (North West) Limited		<p>Respondent has no objection to the proposed approach of development within Leekbrook contributing towards the requirements for Leek. However, Leekbrook should be specifically identified as part of Leek.</p>			No	No	<p>Leekbrook was identified as a smaller village in the Core Strategy. There is no material evidence to indicate that the settlement has become more sustainable for housing development since 2014.</p> <p>Leekbrook's contribution towards Leek's employment land requirement was a principle agreed in the Core Strategy. Industrial estates are often peripheral to the towns that they serve as is the case with the Leekbrook allocations.</p> <p>The supporting text to Policy SS2 explains how the spatial strategy maintains a settlement hierarchy based on Core Strategy Policies SS6/6A/6B/6C so as to create sustainable, self supporting communities. This categorisation of villages was based on their population, services, facilities and capacity for development, and was found sound at Core Strategy examination.</p>	No
LPS181	Biddulph Area Strategy	Policy SS 6	Mr N Weaver, Mrs B D Eastwood, Mr		<p>The strategy for Biddulph established by Policy H2 and Policy SS6 focuses on two large mixed-use allocation sites, one which is particularly large, to meet the housing requirement for the Town along with the regeneration of specified brownfield sites. This</p>			No		<p>The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site not within the Green Belt as a broad location for housing.</p>	No

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			R Weaver and Mr P Weaver		<p>represents a significant shift in strategy from the emerging Site Allocations DPD, which proposed to release a number of small sites around the edge of the town, including the form Knypersley Garden Centre (Site BD069) for housing. Yet there is no evidence or justification for this change in strategy. As such, respondent is concerned that the proposed strategy and emerging Plan is not justified or sound. Moreover, the land to the west of the bypass in the Wharf Road Strategic Development Area requires the release of a large parcel of Green Belt land.</p> <p>588 dwellings are proposed in the Wharf Road Strategic Development Area. This represents 80% of the total proposed residential allocation for Biddulph and 66% of the total proposed provision, when windfall sites are included. Focusing so much of Biddulph's future housing growth in this location is considered unwise and unsound. As such, respondent expresses concern regarding the deliverability of the site. In particular, the understanding that the site may be in multiple ownerships – bringing a range of possible constraints to the development.</p> <p>With regard to Site BDNEW (the large parcel of Green Belt land being released for development), the respondent is concerned whether its release is justified and the most appropriate strategy, when considered against all reasonable alternatives. The Green Belt Assessment for Additional Sites (2017) assessed the site as having a greater contribution to the five purposes of the Green Belt than a number of reasonable alternative sites in the town, including the former Knypersley Garden Centre site. The site is identified as having weak boundaries to the south and west which are not defensible and could fail to prevent further urban sprawl. This would be in conflict with Paragraph 85 of the NPPF. The respondent also notes that the Council's SHLAA (2016) concluded that development to the land west of Biddulph Valley Way would not be suitable because Biddulph Valley Way provides a strong boundary to the settlement and its development would represent an intrusion into the open countryside.</p> <p>The second mixed-use site is the Tunstall Road Strategic Development Area. This site would require the Green Belt boundary to be amended. Yet, as was the case with Wharf Road Strategic Development Area, Tunstall Road Strategic Development Area was assessed as performing a greater contribution to the purposes of Green Belt than the former Knypersley Garden Centre site.</p> <p>The Council also support the regeneration of two mills in the town for housing. However, in order to deliver a total of 57 dwellings, the site would need to be developed at a density of approximately 150 dwellings per hectare which is extremely high, when compared to the character of the town.</p>					<p>BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p> <p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.</p> <p>The Council's Green Belt Review concludes that Knypersley Garden Centre, BDNEW and the strategic site at Tunstall Road are all suitable for consideration for release from the Green Belt (under exceptional circumstances).</p> <p>The issue of urban sprawl is covered by mitigation measures in Policy DSB1.</p> <p>The SHLAA being referred to was published in 2015 alongside the Site Options Local Plan Consultation. This was an early stage in the Local Plan production process and key evidence base documents were yet to be undertaken e.g. the Green Belt Review. Circumstances have changed since these SHLAA records were created.</p> <p>The densities for Biddulph Mills are considered to be realistic. The Council is aiming to minimise levels of Green Belt release.</p>	

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LPS216	Biddulph Area Strategy	Policy SS 6	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) support the requirement for the provision of land for a new First School. In Biddulph the proposed housing growth can be accommodated through expansions to existing schools. Therefore, there is adequate policy coverage for the collection of developer contributions subject to completion of a Statement of Common Ground (SOCG).					Comments noted.	No
LPS310	Biddulph Area Strategy	Policy SS 6	Mr Gez Willard	Willardwillard Ltd	The development of BDNEW is not supported and considered unacceptable incursion into the Green Belt. The respondent suggests the development of an alternative site at Gillow Heath (BD138a & BD138b).					BDNEW was assessed in the Green Belt Review Additional Site Appraisals published in April 2017 and was considered suitable for release from the Green Belt under exceptional circumstances. BD138a and BD138b were included in the Site Options Consultation Booklet published in July 2015. The wording in the booklet makes it clear that this list of sites potentially suitable for development formed the basis of public consultation and the inclusion of a site on the list at that stage did not imply the Council's support for that site as an allocation. It also stated that not all of the sites included would be needed and the list would be refined into preferred options following feedback from consultation. These sites were not included at the next stage (Preferred Sites and boundaries published in 2016) because the Council's Green Belt Review (published in November 2015) did not recommend the sites for release from the Green Belt due to visual intrusion and the openness of the Green Belt being compromised.	No
LPS378	Biddulph Area Strategy	Policy SS 6	Mr Christopher Howle		<p>The respondent agrees with the broad principles of this approach, most notably the identification of housing sites on land both within and adjacent to the urban area. However, the Council need to ensure that a sufficiently aspirational policy is set out to ensure that sufficient housing can be brought forward during the entire plan period.</p> <p>The Sustainability Appraisal identifies a number of sites situated outside of the settlement boundary of Biddulph, which the Council propose to allocate as urban extensions for residential development. However, by discounting the opportunities to provide further urban extensions for housing around Biddulph, this could result in an unbalanced provision of housing growth across the settlement on account of its failure to discount sites that could provide sufficient growth around the core areas of Brown Lees and Knypersley. Although reasonable alternatives outside of the Green Belt have been considered, the total level of housing proposed to be delivered through the Local Plan falls short of the OAN. It is therefore considered that a holistic approach should be taken in the release of further sites around Biddulph, with such sites being considered in terms of the purposes of including land within the Green Belt.</p>			No		<p>The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p>	No
LPS391	Biddulph Area Strategy	Policy SS 6	Seabridge Developments		This representation is submitted by an agent on behalf of Seabridge Developments Limited who object to the policy. They			No	No	There are still opportunities for small and medium sized builders to develop in Biddulph through windfall sites which are	No

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			Limited		<p>object to this policy because they consider the strategy for Biddulph to be fundamentally flawed and unsound in that it does not provide for a range of sites of different sizes, including smaller sites that are capable of being delivered quickly within the early part of the plan period. This flawed approach is contrary to the Government's policy objective of supporting small and medium sized house-builders and its emerging policy of promoting small sites as expressed in Paragraph 69 of the draft NPPF. Seabridge Developments Limited are concerned that the vast majority of the provision is proposed to be met on one strategic site (DSB1), which is likely to take several years to deliver any new homes.</p> <p>Seabridge Developments Limited are disappointed that the Council has ignored calls for it to reconsider its strategy for Biddulph and to include a wide range of sites including BD062 at Gillow Heath, which was previously identified by the Council as suitable for allocation, not least because it (along with other land at Gillow Heath – BD068 and BD087) does not make a strong contribution towards the objectives of the Green Belt.</p>					<p>positively promoted in the plan (refer to Policy H1). A windfall allowance has been incorporated into the housing land supply tables in Policy SS4.</p> <p>Site BD062 was included as an option in the 2015 'Site Options' consultation and in the 2016 'Preferred Option Sites and Boundaries' consultation. However, following the emergence of an alternative more preferable site, this site was removed from the plan in 2017. Also, in their response to the Submission Version Local Plan, United Utilities (whose water treatment works is immediately adjacent to the site) states that "United Utilities wishes to reiterate its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure." (LPS391)</p> <p>The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p>	
LPS217	Paragraph	7.53	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	In Cheadle a new Primary School is required to cater for the quantum of new housing proposed. The proposed allocation of land to the north for a school is supported by Staffordshire County Council (SCC) because it provides for an improved distribution of provision. Furthermore, over time the new school to the north may also pull in children from existing residential areas to the north of the town which may aid in lessening the impact of primary school based trips through the town centre in morning peak hour.					Support noted.	No
LPS85	Paragraph	7.54	Mr T A J		The first sentence of this paragraph should say "need for and viability of" instead of "need and viability of". The sentence is inconsistent with the approach taken at Mobberley Farm where Policy DSC3 requires "Construction of development access roads	SMDC and Staffordshire County Council as the highways authority need to agree whether a link road	Yes	No	Yes	<ul style="list-style-type: none"> Agree that an amendment should be made to paragraph 7.54 as follows: 'One of the most significant challenges is identifying the need for and viability of a link road to relieve through traffic in the town and 	Yes

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			Campbell		along the safeguarded route for a potential future link road of a sufficient design standard to facilitate a link road."	to ease perceived town centre congestion is necessary. If it is, they need to decide which route would be the most effective.				<p>provide improved access to existing and planned housing and employment areas.'</p> <ul style="list-style-type: none"> • It is a Council aspiration to safeguard the route of a potential future link road in Policy SS7. • Policy DSC 3 does not require the provision of a link road but requires that access roads within the development should follow the safeguarded route. • Paragraph 9.83 states that 'Developers should liaise with the District Council and the Highways Authority regarding the specification and route of the link road'. 	
LPS339	Paragraph	7.54	Mr Paul Hill	RPS Planning & Development	<p>Identifying the need and viability of a link road is an important issue that requires thorough consideration in the Local Plan. This is because there will be costs associated with the delivery of this infrastructure and third party land. Yet the costs for delivering infrastructure have not yet been identified. As such, more work is necessary to understand the financial implications associated with a new link road and potential bridge over the disused railway line. It is, however, first necessary to consider whether there is in fact a need for a link road and whether it's necessary for this new link road to serve Mobberley Farm.</p> <p>According to the Phase 2 Cheadle Town Centre Transport Study Report (Paragraph 4.2), a new link road would not be an effective mechanism for the town and would not resolve congestion issues in Cheadle. Although the provision of a link road has been a longstanding aspiration for the Council, based on the above information, the provision of a link road would appear to require further justification for its inclusion and without this, this element of the policy would appear unsound.</p> <p>Another difficulty raised in the Transport Study is the feasibility of a link road to come forward. There is no link between the A522 and the A521 because the route is severed by a disused railway line in third party ownership. Notwithstanding issues with ownership, the Study indicates that a bridge would be required to connect a link road through. As established by the Transport Study, other more viable options are favoured by the Local Highway Authority for assisting with addressing the transport challenges of Cheadle. As such, any associated S106 Planning Obligations should not be diluted away from the Local Highways Authority favoured proposals.</p> <p>It is understood that there are known highways issues in Cheadle which RPS is sympathetic to, however for the purposes of plan making it is important that infrastructure requirements and necessary contributions are fairly and reasonably related to the development.</p>	The plan needs to provide further justification for the safeguarding of the link road and without this, its reference is not considered sound.		No	<p>The Cheadle Town Centre Phase 2 Study (2017) considers the potential SW link road. The provision of a link road would allow a percentage of predicted trips from the SW area to traverse Brookhouse Way / A521 opposed to solely the A522, however the level of trips which would use the A521 from this area would have a minimal effect in improving congestion within Cheadle Town Centre.</p> <p>However, although the study considers that the potential future link road would not be a solution on its own, it considers that further connections to a link road around the town would potentially offer a longer term solution providing a more suitable alternative. It states 'the rationale being that additional highway infrastructure could be funded by the developer, as specified as part of the development. This could be implemented so that over a period of time, such roads would connect, forming an Outer Distributor Road network around Cheadle which could reduce vehicle throughput and congestion in the town centre'. The safeguarding of the potential future link road as part of this allocation would therefore form part of the first phase of this 'Outer Distributor Road'.</p>	No	
LPS86	Cheadle Area Strategy	Policy SS 7	Mr		The aim of allocating new housing to the south of the town on a good transportation route shows that the Plan has been positively		Yes	Yes	Yes	<ul style="list-style-type: none"> • Support noted. • Land to the south of the Mobberley Strategic 	No

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			T A J Campbell		prepared, is justified, consistent with national policy and that it will be effective. Given that Mobberley Farm has been identified as a sustainable and strategic allocation, it would also make sense to move the boundary of the site further to the south so as to expand the housing market area. This would increase the range of available and affordable house types and market housing, including for first time buyers and families.					Development Area is in the Green Belt. It is considered that there are no exceptional circumstances to justify amendment of the Green Belt boundary in this location. There are other housing sites available in Cheadle not located in the Green Belt.	
LPS142	Cheadle Area Strategy	Policy SS 7	Mr J Steele		The Cheadle Area Strategy remains unsound because the only features that the Council can practically achieve using its own powers, are the granting of planning permission for the two major housing developments. The traffic congestion in the town needs to be addressed through road building rather than the safeguarding of potential routes. The infrastructure in Cheadle needs to be improved before any additional house or commercial building takes place.			No	No	National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Policy SS7 seeks to improve environmental quality and accessibility by addressing traffic related issues in the town centre and along the A521 and A522 by working with partners to develop and implement transport improvements and by safeguarding the route of a potential future link road.	No
LPS146	Cheadle Area Strategy	Policy SS 7	L Valentine-Marlow		Respondent expresses concern over their home town Cheadle. The town centre is deteriorating in that many shops and banks have closed, leaving a number of charity shops, hairdressers and nail bars. Furthermore, the local indoor market recently underwent a substantial refurbishment but has never been fully occupied. As such, people do not consider Cheadle a shopping destination. Traffic jams are also a significant problem in the town, making the high street unsafe. Additionally, large vehicles pass at speed, within inches of people on the pavements. With regard to the Cheadle Area Strategy, it appears that the only thing the Council can practically achieve using its own powers, is the granting of planning permissions for major housing developments. However, the traffic congestion which often brings the town to a standstill needs to be put right through the construction of roads. Safety improvements also need implemented. No more houses should be built until the traffic problems have been resolved. The leader of the Council, Sybil Ralphs, made this promise a couple of years ago.			No	No	National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Policy SS7 seeks to improve environmental quality and accessibility by addressing traffic related issues in the town centre and along the A521 and A522 by working with partners to develop and implement transport improvements and by safeguarding the route of a potential future link road. The Sustainability Appraisal indicates that expanding the role of Cheadle is likely to contribute to the safeguarding and improvement of shops and services.	No
LPS338	Cheadle Area Strategy	Policy SS 7	Mr Paul Hill	RPS Planning & Development	RPS are supportive of the approach outlined in this policy. They consider the inclusion of strategic allocations to the north and south of Cheadle as reasonable and justified, which has been arrived at through interrogation of the most appropriate way for Cheadle to grow. The Council has evidenced this in the form of an Options Appraisal, taken forward from the 2016 consultation of Preferred Options Sites and Boundaries. Following the 2016 consultation, a fourth option was sought. As part of the housing strategy for Cheadle, the Council is proposing the development of 'Mobberley Farm'. Mobberley Farm is being actively promoted by Gleeson Strategic Land, on behalf of the landowner of the site. They confirm that the site is	See Comment LPS347. Cheadle should provide a greater focus for growth in the Local Plan. As such, the amount of housing should be reduced to 20% in the Rural Areas with a corresponding increase at Cheadle to 30% housing.		No		The Local Plan seeks a 3% increase in the proportion of housing development in Cheadle and a 3% reduction in the Rural Areas. The hierarchy in SS2 is still considered to be consistent with this approach. Policy SS7 supports this level of growth in Cheadle which is also supported by the SA. The delivery of new housing in Cheadle has been very limited over recent years and the proposed housing requirement for the town will lead to a big uplift in housing delivery, by the inclusion of two Strategic Development Areas and other allocations within the town boundary. It is not considered appropriate to further increase the distribution percentage for the town.	No

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					<p>available for development in line with the Council's plan period.</p> <p>However, Cheadle is the smallest market town in the District and has suffered from under-investment in its infrastructure and town centre, and a lack of housing opportunities. As such, RPS consider that Cheadle and its spatial strategy should seek to identify the town as an area for greater growth than currently envisaged, in order to expand its role as a service centre and market town. Such a revised strategy for Cheadle would achieve this through a greater concentration of development growth than is currently envisaged. Indeed increasing the proportion of growth in Cheadle is generally supported by the SA (Paragraph 6.1408).</p>						
LPS425	Cheadle Area Strategy	Policy SS 7	Mr Greg Powell	Cheadle Unite	<p>Cheadle Unite have attached a table that looks at the potential numbers of housing currently being considered for Cheadle (1,711). This level of housing cannot be accommodated in Cheadle without severely impacting on the infrastructure including road congestion and consequential declining health through air pollution.</p> <p>Cheadle Unite have, as far back as January 2010 highlighted to SMDC that the development of greenfield agricultural sites remote from the potteries where brownfield sites and traffic infrastructure exist, is not acceptable, nor compliant with the National UK Low Carbon Transition Plan and European commitments. Yet the UK is seeing CO2 levels not seen for 800,000 years (see Comment LPS425).</p> <p>Additionally, there have been many housing developments in Cheadle over the last 30 years that have not delivered any significant infrastructure improvements. All have, in effect, increased demand on Cheadle's limited resources. There is no evidence that this will change when more houses are built. Furthermore, despite 378 proposed developments for Cheadle dating back to 1998, only half have been completed. SMDC's proposals equate to an annual house build of 300 houses per year, against a history of 80 houses per year. Moreover, SMDC are not effective in enforcing the highest standards when granting planning permission, be it ineffective drains, inappropriate or missing curbs and pavements.</p>		No	No	No	<ul style="list-style-type: none"> The sustainability of the plan and related infrastructure requirements are considered in the Sustainability Appraisal and Infrastructure Delivery Plan. The Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development. The overall housing requirement takes into account housing commitments, allocations and windfall allowance. Any new development taking place will be subject to policies contained within the new Local Plan. 	No
LPS428	Cheadle Area Strategy	Policy SS 7	Mr Greg Powell	Cheadle Unite	<p>Cheadle has serious road network issues that residents have raised as a real barrier to further expansions of the town. Road traffic surveys have found that roads are already running 'at capacity'. Furthermore, Sybil Ralphs has stated "not another brick until our roads are improved". Cheadle Unite understand that SMDC looked at a North West Link Road to divert traffic, but the costs were prohibitive. Surely if no adequate road improvements can be made, development must go where existing infrastructure already exists.</p>		No	No	No	<ul style="list-style-type: none"> The sustainability of the plan and related infrastructure requirements are considered in the Sustainability Appraisal and Infrastructure Delivery Plan. Specific consideration has been given to transport issues in Cheadle. The Phase 2 Cheadle Study predicts that in 2031 general traffic growth plus additional trips generated by new housing and employment development will cause increased queuing and delays. There is limited scope to change junction characteristics due to the historically confined road structure, however the study recommends a package of mitigation measures which could provide some additional capacity to the overall network. 	No

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LPS450	Cheadle Area Strategy	Policy SS 7	Mr A Weston		Housing numbers for the district and Cheadle are too high. Housing proposed in the north of Cheadle should be reduced and the school should be relocated to a more sustainable area.	Reduce the housing numbers for the district and Cheadle. Additionally, relocate the school in Cheadle.		No	No	The assessment of objectively assessed need for housing reflects ONS data and Government guidance. The distribution of development proposed in the Local Plan enables the housing requirement to be met without significant Green Belt release. Cheadle's share of the District's requirement has risen from the 22% previously put forward in the Core Strategy to reflect the availability of suitable development sites outside the Green Belt. Staffordshire County Council (SCC) support Policy DSC1 in that it makes provision for a new County Primary School and school/community playing pitches. The existing primary schools serving the town are clustered in the centre in relatively close proximity. The proposed allocation of land to the north for a school is supported as it provides for an improved distribution of education provision.	No
LPS540	Cheadle Area Strategy	Policy SS 7	Muller Property Group		The respondent maintains their support for this policy.					Support noted.	No
LPS442	Cheadle Area Strategy	Policy SS 7	J Weston		Housing numbers for the district and Cheadle are too high. Housing proposed in the north of Cheadle should be reduced and the school should be relocated to a more sustainable area.	Reduce the housing numbers for the district and Cheadle. Additionally, relocate the school in Cheadle.		No	No	The assessment of objectively assessed need for housing reflect ONS data and Government guidance. The distribution of development proposed in the Local Plan enables the housing requirement to be met without significant Green Belt release. Cheadle's share of the District's requirement has risen from the 22% previously put forward in the Core Strategy to reflect the availability of suitable development sites outside the Green Belt. Staffordshire County Council (SCC) support Policy DSC1 in that it makes provision for a new County Primary School and school/community playing pitches. The existing primary schools serving the town are clustered in the centre in relatively close proximity. The proposed allocation of land to the north for a school is supported as it provides for an improved distribution of education provision.	No
LPS210	Paragraph	7.59	Mr R Burton		The development of Site EN128 is not appropriate. As such, it is not in accordance with the first sentence of this paragraph. Other possible sites exist. For example, the farm at the top of High View Road is willing to be sold for development. This site would have far less impact on the existing neighbouring properties than would the proposed development of EN128, and would also have the advantage of providing space for any future development.			No		Policies SS 8 and H1 allow for residential development in the larger villages through windfalls within the village boundaries and limited infilling in defined circumstances on the edge of settlement boundaries provided it is of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy. Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity. New housing schemes will need to incorporate areas of open	No

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										space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links. Sites EN007/012/019/101 all lie within the Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.	
LPS33	Larger Villages Areas Strategy	Policy SS 8	Mr Howard Leeson	Director Ken Wainman Associates Ltd	The inclusion of the land to the north of Hawes Farm is sound and would make use of an infill site in a larger village where housing is needed. Respondent has attached their representation from the previous stage (Preferred Options) of the Local Plan consultation (see LPPO689).		Yes	Yes	Yes	Support for boundary noted.	No
LPS42	Larger Villages Areas Strategy	Policy SS 8	Mrs Thalia Bode		<p>Respondent is concerned that the Submission Version Local Plan is unsound because it does not, in some areas, appear positively prepared (based on a strategy to meet objectively assessed development requirements) or justified (fails to demonstrate that the Plan is the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence). Respondent expresses concern over policies SS8 and H2, with regard to housing development in Cheddleton.</p> <p>In the preparation of the Plan and its supporting documents, a need for housing was identified in the settlement of Cheddleton, which is referred to within the Plan as a Large Village. According to the Plan, Large Villages are intended to provide the bulk of the housing requirement of the Rural Areas.</p> <p>While the Plan proposes residential allocations that may or may not be sufficient to meet housing need at an authority/housing market level, the Plan fails to meet objectively assessed development requirements at or within acceptable proximity to Cheddleton. Evidence base documentation previously identified a need for 115 dwellings.</p> <p>The failure of the Plan to identify housing land at or in reasonable proximity to Cheddleton is a failure to pursue a strategy which seeks to meet development need. Potentially suitable sites for residential development capable of supporting sustainable development are available in this area, such as land at the rear of 399-411 Cheddle Road, Cheddleton (Ref. CD017).</p> <p>In order to be justified, the Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence. The failure to provide housing at Cheddleton beyond infill development (which is unlikely to occur owing to the very tight village boundary and Green Belt envelopment) has not been justified or sufficiently evidenced and</p>	<p>In order to be considered 'positively prepared', the Plan should be amended to make provision for residential development sufficient to meet identified local housing need. The previously preferred site, CD017, should be reinstated as a housing allocation. The allocation of this site would go some way towards meeting identified development requirements.</p> <p>In order to be considered 'justified', the Plan should present the most appropriate strategy for accommodating the needs of communities in and around Cheddleton, without the expectation that families must move away from their existing communities in order to access new housing. Reasonable alternatives to this scenario exist, notably the allocation of Site CD017.</p> <p>Respondent concludes that proportionate evidence must be provided to demonstrate how sufficient volumes of new homes can be provided</p>		No	<p>The housing requirement of 320 dwellings per annum is close to the top end of the range of the objectively assessed need for housing (235-330 dpa). The requirement is considered to be positively prepared on the basis that:</p> <ul style="list-style-type: none"> • It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build • It supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with Paragraph 21 of the NPPF. • The Council has considered the scope to accommodate unmet housing needs in relevant neighbouring authorities but is unable to do so due to a constrained land supply. This is set out in the Duty to Co-operate Statement. <p>The Sustainability Appraisal provides a detailed assessment of alternative possible options including the spatial distribution of development.</p> <p>The Local Plan does not specify housing targets for individual larger villages. The indicative housing requirement for settlements in the Site Options Consultation 2015 was included as a guide based on the information at the time. It was estimated using the following data;</p> <ul style="list-style-type: none"> • Core Strategy policy SS3 relating to the spatial distribution of development between the towns and rural areas. • Population/facilities of settlements 	No	

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					<p>is at odds with the intention to accommodate the bulk of rural housing within the named 'larger villages'. This is explained in greater detail within respondent's previous representation to the LPA at the Preferred Options stage (see Comment LPPO2219). Respondent references the response they received from the LPA to Comment LPPO2219.</p> <p>Contrary to the response from the Council to Comment LPPO2219, Site CD017 has not been taken forward and Cheddleton does not benefit from any housing allocation, resulting in a spatial shortfall in housing supply. The Officer's expectation for windfall in significant numbers within Cheddleton is unfounded, and the release of land from the Green Belt is the only realistic prospect of significant new housing in this locality. Development in the Green Belt is by definition inappropriate, with few exceptions, and therefore development proposals beyond the boundary edge, infilling or otherwise, are unlikely to accord with national Green Belt policy.</p> <p>The Officer contends with no evidence that exceptional circumstances do not exist, for the removal of land from the Green Belt at Cheddleton. However, land has been removed from the Green Belt elsewhere (e.g. Blythe Bridge and Werrington). Respondent says that it is not clear why Green Belt land has been removed from some parts of Staffordshire Moorlands but not others such as Cheddleton, where there is an identified need for housing land which is unlikely to be accommodated within the existing village boundary. This failure in justification is particularly acute when it is considered that the Green Belt Review that forms part of the Plan's evidence base concludes that development at Site CD017 is expected to have limited impact on the purposes of the Green Belt.</p>	<p>to meet the established need in Cheddleton through windfall within the settlement boundary or through infilling at the edge of the settlement that accords with national Green Belt policy. Justification must also be provided as to why other sites are deemed suitable for Green Belt release, when this opportunity is not considered appropriate at Cheddleton.</p>				<ul style="list-style-type: none"> • Sites identified in the SHLAA <p>The Local Plan policies and site allocations were refined during the plan making period as more information became available. The Local Plan does not specify housing targets for individual larger villages.</p> <p>The site was in the Site Options consultation 2015 and the Preferred Options Sites and Boundaries consultation 2016 but was not taken forward.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of the site suggested from the green belt.</p>	
LPS114	Larger Villages Areas Strategy	Policy SS 8	Mrs MELANIE THOMAS		<p>With regard to the first bullet point under section 2 of this policy, the Local Plan fails to justify the inclusion of Site EN128 because it does not demonstrate how the development of 22 houses in this location will support or increase the range and quality of community facilities available to the rural areas.</p>	<p>Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.</p>		No		<p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has</p>	No

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										<p>informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	
LPS132	Larger Villages Areas Strategy	Policy SS 8	St Modwen		St Modwen support section 5 of this policy where an action to deliver the policy is listed (Policy DSR 1): "Supporting the mixed-use development of the Blythe Vale site at Blythe Bridge in line with Policy DSR 1". Furthermore, they state that directing 300 new homes towards Blythe Bridge & Forsbrook will directly assist in sustaining the existing level of service and facility provision on offer (they have attached a table to show the services and facilities available in the village).					Response noted.	No
LPS160	Larger Villages Areas Strategy	Policy SS 8	Mr Kevin Thomas		With regard to the first bullet point under section 2 of this policy, the Local Plan fails to justify the inclusion of Site EN128 because it does not demonstrate how the development of 22 houses in this location will support or increase the range and quality of community facilities available to the rural areas.	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		<p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be</p>	No

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										assessed against para 89 NPPF etc.	
LPS283	Larger Villages Areas Strategy	Policy SS 8	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England welcome the reference to sensitive design to enhance the conservation area in site allocation UT109. However, the reasoning behind the proposed mitigation measures in the cited study are unclear, and clarification on what the character of the conservation area is, and design principles for conserving or enhancing it (e.g. heights, building lines, open spaces, relationship to the street, urban grain etc.) would be of benefit. This could potentially be included within the site policies section of the Local Plan.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>					Not all sites have their own policy in the plan and site UT019 doesn't have its own policy. The relevant wording is all contained in Policy SS8 and any applicant can also view the Heritage Impact Study.	No
LPS312	Larger Villages Areas Strategy	Policy SS 8	Mr Gez Willard	Willardwillard Ltd	Respondent agrees that Alton, Brown Edge and Cheddleton are classed as larger villages. It is also agreed that they and the other sites identified should accommodate the bulk of rural housing needs.					Support noted.	No
LPS342	Larger Villages Areas Strategy	Policy SS 8	Mr Martin Webb		The respondent supports the identification of Biddulph Moor as a larger village under Policy SS8. The respondent raises concern that allocations and distribution of development within the Submission Version does not reflect this strategy, with insufficient housing development being apportioned to the villages within the rural area, and in particular Biddulph Moor.			No	No	Support for classification of Biddulph Moor noted. The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the further release of land from the green belt.	No
LPS383	Larger Villages Areas Strategy	Policy SS 8	Ms Carolyn Walker		This policy states that the settlements shall retain and enhance their role as rural service centres, providing for the bulk of the housing requirement of the rural areas and also for employment needs of a scale and type appropriate to each settlement. Blythe Vale does not, however, fit this requirement. The village facilities will not be easily accessible by residents of the development. By utilising pockets of development land within the existing village settlement, it would encourage more use of the local amenities. There are lots of recreational facilities within the village for people to use.	In accordance with the NPPF, the Council should take into consideration the need to promote sustainable patterns of development. Thus smaller, well located sites close to towns and village boundaries should be considered for development.		No	No	The site is located to the south of Blythe Bridge. The policy specifies that the residential development should be located to the north of the site which is more closely related to the village of Blythe Bridge and also includes a requirement for development to improve sustainable transport routes and connectivity with Blythe Bridge.	No
LPS418	Larger Villages Areas	Policy SS	Wainhomes		Leekbrook should be included as part of Leek, to reflect its			No	No	Leekbrook was identified as a smaller village in the Core	No

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	Strategy	8	(North West) Limited		current and proposed role of meeting development needs in Leek, including proposed site allocations, and the intrinsic relationship between the two settlements. However, if the Inspector examining the Plan finds that Leekbrook does not form part of Leek for the purposes of the Plan, then the respondent considers that as a minimum it should be upgraded from a 'smaller village' to a 'larger village', complete with its own development boundary.					Strategy. There is no material evidence to indicate that the settlement has become more sustainable for housing development since 2014. Leekbrook's contribution towards Leek's employment land requirement was a principle agreed in the Core Strategy. Industrial estates are often peripheral to the towns that they serve as is the case with the Leekbrook allocations.	
LPS511	Larger Villages Areas Strategy	Policy SS 8	Mr Grant Anderson	Fradley Estates	<p>Fradley Estates (FE) object to this policy because approximately half of the housing in the Rural Areas (where approximately half of the overall population of the District live) is to be achieved on windfall sites. This approach cannot be considered 'positively prepared' or in accordance with the NPPF. It is also not justified when considered against an approach which identifies a range of allocated sites to meet the identified needs.</p> <p>The sites that come forward under the limited infilling approach, in accordance with Policy H1, will be very small. As such, this approach is unlikely to make a material contribution to the provision of housing in Rural Areas, particularly affordable housing. This is despite the Plan identifying a "high need" in section 4.</p> <p>Furthermore, a strategy that is so reliant (to the extent of 50%) on infill proposals delivering its housing provision will fail to contribute towards the infrastructure required to deliver sustainable communities. The Local Plan should, instead, identify additional housing allocations for the Rural Areas in the largest villages. This will enable the Plan to deliver the necessary development to sustain the future of rural communities. The approach will also facilitate the delivery of more affordable housing and infrastructure, as larger allocated sites will be far better placed to make a meaningful contribution to affordable housing and community infrastructure.</p> <p>Werrington, Cheddleton and Blythe Bridge are the largest villages (in terms of their size and facilities) where the majority of development for the Rural Areas should be allocated. The Local Plan proposes an allocation of 75 dwellings for Werrington. However, given the size and facilities of Werrington, it is capable of accommodating a much greater share of the rural housing distribution. As such, FE's site at Langton Court/Tregaron Court (WE042 and WE043) should be allocated for housing under Policy H2.</p>	The Plan should identify additional housing allocations for the Rural Areas in the largest villages. FE's site at Langton Court/Tregaron Court (WE042 and WE043) should be allocated for housing.		No		<p>The plan seeks to only release Green Belt when there are exceptional circumstances.</p> <p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on</p> <p>small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p>	No

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LPS527	Larger Villages Areas Strategy	Policy SS 8	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	<p>The respondent objects to Policy SS8, arguing that it places too much restriction on the growth of Brown Edge.</p> <p>The Local Plan only proposes a housing delivery figure of 25 dwellings, which is considered to be wholly insufficient to support and enhance existing community facilities as envisaged by this policy. This is confirmed within the HNA for Brown Edge by AECOM which has examined a range of scenarios for determining the local need.</p> <p>The Neighbourhood Plan steering group stated that there isn't sufficient capacity within the village to deliver the 25 dwellings envisaged by the Local Plan. The Neighbourhood Plan Steering Group have expressed the view that releasing a piece, or more than one piece of Green Belt on the edge of the village, would be more sustainable than losing existing open spaces within the village that contribute to the overall visual character and quality of the village.</p> <p>Planning properly to meet identified local need within Brown Edge, including any potential release of Green Belt through the Local Plan, is considered to be a more robust way of addressing housing needs, rather than trying to justify Green Belt release after the Local Plan has been adopted on the basis of a rural exceptions scheme.</p> <p>During the previous round of consultation Knights, on behalf of their client confirmed to the Council that they shared the view of the Neighbourhood Plan Steering Group, and as part of further consideration of Policy SS8 requested that the housing need for Brown Edge is properly considered, perhaps as a joint exercise with the Neighbourhood Plan Steering Group.</p> <p>No justification is provided as to why it is appropriate to release land in Werrington from the Green Belt, but not Brown Edge.</p>		No	No	<p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the further release of land from the green belt.</p> <p>The exceptional circumstances that apply to other sites, including Werrington is set out in the Topic Paper.</p>	No	
LPS440	Larger Villages Areas Strategy	Policy SS 8	Richard House	Gladman	<p>Whilst Gladman support the thrust of this policy, and welcome the inclusion of Upper Tean as a large village, they are concerned that the number and distribution of housing allocations for the larger villages will not support the long term vitality and viability of these important service centres. Of the 12 larger villages identified in this policy, only six have housing allocations. For Upper Tean, there is one allocation for just 15 dwellings. This level of housing provision will not support the viability and vitality of rural communities.</p>	Additional housing allocations are required in the large villages, including Upper Tean.	Yes	No	Yes	<p>Upper Tean has the benefit of an allocation and recent planning consents to support housing growth in the village. Policy H1 also allows for development on non-allocated sites, subject to specified criteria.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the further release of land from the green belt.</p>	No
LPS476	Larger Villages Areas Strategy	Policy SS 8	Renew Land Development		This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the		Yes	Yes	Yes	Site at Upper Tean with permission for residential development is proposed to be included within the Village boundary and is	No

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			Ltd.		<p>development of land at: (1) Jacksons Nurseries/Levens, Biddulph; (2) the former Meadows School, Biddulph (which adjoins the previously mentioned site); and (3) Cheadle Road, Upper Tean. They support the allocation of site (3) mentioned above as a site with planning permission, as well as the proposed Village Boundary that incorporates the site (see Map A4.9).</p> <p>The planning application submission (SMD/2015/0424) and the LPA's handling/determination of that application demonstrated that it is a deliverable housing site with good accessibility to services and facilities. As such, Renew Land Developments Limited propose that the site is both shown as a site with planning permission and allocated for housing development (or just the latter if preferred).</p>					identified as a site with permission on Map A4.9 of the Submission Version Local Plan.	
LPS5	Smaller Villages Area Strategy	Policy SS 9	Mr Roger Holdcroft	Chair Draycott Parish Council	<ul style="list-style-type: none"> General concern expressed over the effect the Local Plan will have on the parish of Draycott in the Moors, specifically the village of Draycott and the hamlet of Cresswell. On page 71 (Policy SS 9) Draycott is referred to as a smaller village, which it is. There are very few amenities in the village. Furthermore, page 7 talks about a "modest scale of development in villages" whilst page 37 states "The rural areas will have viable, attractive villages... appropriate, sensitive growth". Page 46 states that, with regard to rural area smaller villages, "Development on a large scale would be unsustainable in these villages, as it will generate a disproportionate number of additional journeys outside the village and may undermine the spatial strategy... these settlements have a limited role in meeting the development requirements for the District". Lastly, page 71 states that development will be "strictly controlled in order to ensure that the character and life of the settlement is not undermined". Yet what is said in these quotes applies to all villages in Staffordshire Moorlands except Draycott and the nearby hamlet of Cresswell. Respondent is aware that the comments being taken on the Submission Version Local Plan relate to matters of legality, but ethics are also relevant. The Plan clearly intends to maintain village format and life, yet the vicinity of Draycott is subject to 186 houses and industrial units in Cresswell. The addition of 300 dwellings in the Blythe Vale development, partly in the parish (Draycott in the Moors) also puts large strain on the village of Draycott. With regard to development in the parish, traffic, lack of amenities and infrastructure have not been considered. This is unfair. The document then, surprisingly, lists that Draycott requires a further 5-10 dwellings between 2017 and 2031. Respondent has written these sentiments before and reported them to the Local MP, but they have been ignored. Respondent has lost faith in the local planning system and assumes there is no quality assurance from the Government. Fairness is being replaced by 					<p>The Blythe Park application has been through due process and has the benefit of planning consent. The Local Plan takes account of all sites with planning consent in terms of commitments.</p> <p>The Local Plan allocates sites for residential development to meet the housing requirement and has regard to the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity, landscape or heritage impacts, including on the setting of the Peak District National Park.</p>	No

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					<p>hypocrisy.</p> <ul style="list-style-type: none"> Respondent feels few changes have been made to the Plan since the previous version (Preferred Options). 						
LPS48	Smaller Villages Area Strategy	Policy SS9	Mr David Walters		<p>Objects to the Local Plan as it stands at the moment. Respondent feels there are matters of legal compliance and soundness which are lacking, especially with regard to the removal of village boundaries.</p> <p>Respondent's village is currently classed as a Smaller Village and this classification is vital in protecting its integrity and serves as a protection against unnecessary or obtrusive development that would seriously alter the character of the village and its neighbourhood. To remove such a designation as is being proposed is therefore unsound and a move that lacks legal compliance when considered against other measures that the Localism Act has endeavoured to establish.</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	No
LPS53	Smaller Villages Area Strategy	Policy SS9	Mr Peter Cowie		<p>Respondent objects to the aspect of the Local Plan which seeks to change village boundaries. In the Core Strategy, villages are designated small, medium or large. If village boundaries are changed or removed, then the designation of villages in the Core Strategy will no longer make sense. The Local Plan is therefore not legally compliant since it is in conflict with the Core Strategy which sets out to protect the character of villages and the rural environment (see page 140 and Policy R1 in Core Strategy).</p> <p>Of equal concern is the case where small villages which were once</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages</p>	No

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					part of open countryside and therefore had no boundary, have now been allocated a development boundary without any consultation involving residents.					<p>and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p> <p>The Council has undertaken extensive consultations on the emerging Local Plan full details are given in the Consultation Statements.</p>	
LPS60	Smaller Villages Area Strategy	Policy SS9	Mr Nick Mountford		<p>This representation is written on behalf of the site owner.</p> <p>It is contended that Stockton Brook is part of Endon Village and should be included with Endon as a large village under Policy SS8 (Larger Villages). Stockton Brook is unlike the other villages in that it contains a wide range of services and is close to other services in Stoke City (less than 400 metres away) and Endon. Stockton is physically connected to Endon and in the same parish as Endon (Endon Stanley Parish). Stockton Brook is also located on the Leek to Stoke main road, along which there is a frequent and regular bus service which also passes through Endon and Baddeley Green in Stoke.</p> <p>It is requested that the Council view Comment LPS51. Present services in the village of Stockton Brook include: a general store, supermarket, doctor's surgery, golf course, public houses, restaurants, a barber's, beauty shop and children's nursery.</p> <p>In summary, it is argues that other alternative strategies would</p>	Stockton Brook should be included as part of Endon to form a single larger village named 'Endon and Stockton Brook'.	Yes	No	Yes	<p>Stockton Brook is a separate settlement from Endon. Policy SS2 defines the settlement hierarchy which is inline with the adopted Core Strategy. Settlements were categorised according to their services and facilities.</p>	No

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					better meet the needs of the village and that if the two villages (Stockton Brook and Endon) were combined together as one larger village it would better enable local housing needs to be met.						
LPS57	Smaller Villages Area Strategy	Policy SS 9	Mr James Green		Objects to the Local Plan because it is neither sound nor legal. Respondent notes that the removal of village boundaries undermines and removes the protection of some important policies contained within the Core Strategy that relate to transport and small/medium/large villages within the Churnet Valley. The removal of village boundaries also makes the 43 currently proposed Neighbourhood Plans inoperable.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District once adopted they will form part of the Development Plan.</p> <p>The Local Plan will replace the Core Strategy.</p>	No
LPS66	Smaller Villages Area Strategy	Policy SS 9	Mr Anthony Wheat		The consultee has a small potential infill site to the south of Ash Cottage where they would like to construct a house for a farm worker and, if possible, an affordable house or starter home. The farm worker's dwelling would help make the affordable house viable. However, unless the site was accepted as a rural	Policy SS9 should be amended to include designated settlement boundaries that maintain and enhance the vitality of	Yes	No	Yes	<p>The site is in the green belt in a Smaller Village.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The</p>	No

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					<p>exemption site, it would not be possible under Green Belt policy to build the two houses.</p> <p>The village of Dilhorne could accommodate more housing without development having an adverse effect on the character of the village, particularly infill development. For the vitality of the village to be maintained, more houses are needed, including affordable houses. Dilhorne has many services compared to the rest of the District's Smaller Villages, and new housing development would help maintain these services, particularly the school. Locating more houses in the Smaller Villages would help maintain the larger, service-centre villages in accordance with national policy. More provision could also be made for small employment sites in villages – both large and small.</p> <p>The village of Dilhorne is linear and there are several smaller gaps, particularly on the eastern side of Godley Lane, which could be developed without having an adverse effect on the character of the village. However, applications have previously been refused in many of these gaps on Green Belt grounds. This suggests that little new housing will be possible in the future.</p> <p>It is contended that Policy SS9 is unsound in that a better alternative would be to designate a development boundary around the village of Dilhorne in which new housing development would be allowed. If such a boundary were to be designated it would be reasonable to expand the development boundary to include the houses on Godley Lane northwards, up to the 30mph sign.</p> <p>Such a boundary would provide better control of development as it could be drawn to only include those parts of the village which the Council consider could be developed for new dwellings. The boundary could exclude the larger gaps to maintain the overall character of the area, and consist of discrete pockets/groups of houses and potential infill sites, excluding the larger green spaces between existing development.</p> <p>Furthermore, the consultee is concerned about the provision of affordable housing. Policy H3 states that developments of four or less dwellings would not be expected to provide affordable housing. Therefore, as infill developments are normally less than five houses, it is unlikely that there would be any provision of affordable housing in the village. It is appreciated that there is a large development of affordable housing at the Cellarhead crossroads but those houses are not in Dilhorne where there is a need.</p>	<p>the Smaller Villages (including Dilhorne) through the provision of housing.</p>				<p>distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps. Dilhorne is washed over by the Green Belt.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested or site allocations. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did</p>	

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										<p>identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>Policy H3 sets out how affordable housing will be delivered. In the villages a target of 33% affordable housing should be provided on sites that could accommodate 5 dwellings (0.16 hectares) or more. Rural exception sites for small schemes of 100% affordable housing will be permitted on suitable sites in or on the edge of villages where a need exists in the local area which cannot otherwise be met. Policy H1 allows for dwellings that meet an essential need including agricultural workers dwellings.</p>	
LPS74	Smaller Villages Area Strategy	Policy SS 9		The Winterton Lodge Partnership	The Winterton Lodge Partnership recommends widening the type of development that may be appropriate in the Smaller Villages, to include development that meets a cultural need.	The Winterton Lodge partnership recommends the following amendment (shown in bold) to the sentence under the list of settlements in the policy: "These settlements shall provide only for appropriate development which enhances community vitality or meets a social, cultural or economic need of the settlement and its hinterland." This will allow for development which benefits the cultural or built heritage of a settlement and its surrounding area to be policy compliant. These benefits could be of national significance and should, therefore, be recognised.	Yes	No	Yes	Policy E4 supports cultural development in the rural areas having regard to the Area Strategies.	No
LPS116	Smaller Villages Area Strategy	Policy SS 9	Mr Kenneth Unwin		<p>Respondent is a Parish Councillor, representing the views of the village of Kingsley Holt. Concern has been expressed by residents over the proposal to remove the '1998 Local Plan Village Boundary'. They consider the removal of this boundary wholly unsound and inconsistent. Little (or nothing) can be gained by this proposal, and the explanation given at the recent SMDC Parish Assembly was unconvincing.</p> <p>Respondent makes the following points, with regard to the</p>			No		<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green</p>	No

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					<p>proposal to remove the planning boundary around the small villages:</p> <ul style="list-style-type: none"> It is inconsistent with the protection given to medium and large villages. It will potentially lead to villages unnecessarily spreading out onto adjacent Green Belt and nearby farmland (an environment that must be protected). It is an invitation for speculative and unwelcome planning applications around the outside of smaller villages. Relaxing planning protection in small villages is unnecessary, given the availability of brownfield sites. Reduces the ability of local communities/parish councils to control or influence what is happening in their area. <p>Respondent would like the Council to reconsider this policy.</p>					<p>belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS117	Smaller Villages Area Strategy	Policy SS 9	Mr Denis Hurst		<p>The removal of village boundaries would undermine and effectively remove the protection of some important policies contained within the Core Strategy, specifically those related to transport and small/medium/large villages within the Churnet Valley. The removal of village boundaries also makes the 43 currently proposed Neighbourhood Plans inoperable.</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p>	No

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										<p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District once adopted they will form part of the Development Plan.</p> <p>The Local Plan will replace the Core Strategy.</p>	
LPS137	Smaller Villages Area Strategy	Policy SS9	Mrs Diana Gardner		<p>Objects to the Plan due to the removal of village boundaries. Village boundaries are there to protect villages and the countryside, at the same time as preserving the special character of communities. The Council should be helping to protect the nature of Staffordshire Moorlands and the Churnet Valley rather than allowing for unrestricted development which could have an adverse effect on the area. The Plan lacks soundness and legal compliance by directly contravening SMDC's Core Strategy, the masterplan for the Churnet Valley and Neighbourhood Plans.</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach</p>	No

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										<p>allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District once adopted they will form part of the Development Plan.</p> <p>The Local Plan will replace the Core Strategy.</p>	
LPS140	Smaller Villages Area Strategy	Policy SS 9	Mr J Steele		<p>The removal of village boundaries is unsound and has no legal basis. Village boundaries define villages for planning purposes but also give people a sense of community and ownership.</p> <p>The residents in the villages of Whiston and Kingsley Holt feel threatened by this proposal because it threatens the shape and integrity of their villages purely by the desire of developers to maximise their profits. The residents are happy to accept sympathetic infill development, and the Parish Council have suggested this in previous consultations. However, proposing 25% of new housing in rural areas adds to concern over the removal of village boundaries.</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	No
LPS145	Smaller Villages Area Strategy	Policy SS 9	Mrs Claire		Respondent objects to the Local Plan. This is because people's objections to the developments proposed in the Plan have been ignored by the Council. The proposed developments will result in			No	No	Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be	No

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			Skitt		<p>the uncontrolled expansion of many of the villages, which will have an adverse effect on the character and nature of the Churnet Valley. Furthermore, the respondent does not support the lack of constraint for future developments, brought about by the removal the village boundaries.</p> <p>The proposal to remove the village boundaries contravenes the Core Strategy, the Churnet Valley Masterplan and the Neighbourhood Plans currently in place or in progress.</p>					<p>removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p> <p>In determining which sites should be included in the Local Plan, the Council must balance Government planning policy, relevant evidence and public opinion</p>	
LPS149	Smaller Villages Area Strategy	Policy SS 9	AD Sharman		<p>Respondent objects to the Plan due to the proposal to remove the village boundaries. This proposal does not comply with the Core Strategy. Additionally, communities will, against their rights, not be able to develop their Neighbourhood Plans.</p> <p><i>(Please note that this representation has been redacted because the matter raised is not relevant to the process and there is a separate procedure for raising concerns regarding the conduct of</i></p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages</p>	No

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					Councillors.)					<p>are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District once adopted they will form part of the Development Plan.</p> <p>The Local Plan will replace the Core Strategy.</p>	
LPS151	Smaller Villages Area Strategy	Policy SS 9	B Benjamin		Respondent objects to the Plan due to the proposal to remove the village boundaries. Removing the village boundaries will undermine and effectively remove the protection of some important policies contained within the Core Strategy, specifically those related to transport and small/medium/large villages within the Churnet Valley. It will also render the 43 currently proposed Neighbourhood Plans inoperable.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1</p>	No

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										<p>supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p>	
LPS152	Smaller Villages Area Strategy	Policy SS 9	Mrs J Russell		Respondent objects to the Plan due to the proposal to remove the village boundaries. Removing the village boundaries will undermine and effectively remove the protection of some important policies contained within the Core Strategy, specifically those that relate to the enrichment of daily living, sustainability of community identity and the environment. The value of the Churnet Valley is its community and green spaces. Removing its village boundaries will disperse this identity, allowing for unfettered development.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did</p>	No

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										<p>identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p>	
LPS240	Smaller Villages Area Strategy	Policy SS 9	John Nicholas		The respondent argues the Local Plan is neither sound or legally compliant. This is due to a lack of compliance with the SMDC Core Strategy, specifically policies relating to transport, small/medium/large villages within the Churnet Valley and making proposed Neighbourhood Plans inoperable.			No	No	<p>The Local Plan will replace the Core Strategy. Policy SS11 is largely the same as the approach to the Churnet Valley as the adopted Core Strategy. The policy provides a clear link to the Churnet Valley Masterplan.</p> <p>The Local Plan clearly identifies the strategic policies that emerging neighbourhood plans must be in general conformity with in order to assist their preparation. There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p>	No
LPS244	Smaller Villages Area Strategy	Policy SS 9	John Nicholas		The respondent argues the Local Plan is neither sound or legally compliant. This is due to a lack of compliance with the SMDC Core Strategy, specifically policies relating to transport, small/medium/large villages within the Churnet Valley and making proposed Neighbourhood Plans inoperable.		No	No		<p>The Local Plan will replace the Core Strategy. Policy SS11 is largely the same as the approach to the Churnet Valley as the adopted Core Strategy. The policy provides a clear link to the Churnet Valley Masterplan.</p> <p>The Local Plan clearly identifies the strategic policies that emerging neighbourhood plans must be in general conformity with in order to assist their preparation. There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p>	No
LPS248	Smaller Villages Area Strategy	Policy SS 9	Mr Damian Emery		The respondent objects to the removal of village boundaries. They feel the Plan will benefit developers to the detriment of local communities. Concern was also expressed over the local communities becoming part of Stoke-on-Trent.			No		<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and</p>	No

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										<p>character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS250	Smaller Villages Area Strategy	Policy SS 9	Carmn Giuliano-Worthington	Kingsley Parish Council	Respondent on behalf of Kingsley Parish Council objects to the proposed change to village boundaries as it would result in urban sprawl within the Green Belt. The proposals should be reconsidered as members of the 'Parish Assembly' unanimously disagreed with this policy.					<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill</p>	No

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										proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.	
LPS259	Smaller Villages Area Strategy	Policy SS 9	James Green		The respondent argues the Local Plan is neither sound or legally compliant, particularly with regard to the removal of village boundaries. This is due to a lack of compliance with the SMDC Core Strategy (2013), specifically policies relating to transport, small, medium and large villages within the Churnet Valley and making proposed Neighbourhood Plans inoperable.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District once adopted they will form part of the Development Plan.</p> <p>The Local Plan will replace the Core Strategy.</p>	No
LPS261	Smaller Villages Area Strategy	Policy SS 9	Mr Peter		The respondent objects to the removal of village boundaries, which is neither sound nor legally compliant due to a lack of compliance with the Core Strategy. Additionally, concern is raised regarding the allocation of a development boundary			No	No	Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller	No

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			Cowie		around the small villages without consulting residents. Lastly, the respondent feels that the Council should look to incentivise the occupation of empty properties.					<p>Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p>	
LPS419	Smaller Villages Area Strategy	Policy SS 9	Wainhomes (North West) Limited		<p>Respondent objects to the identification of Leekbrook as a 'smaller village' under Policy SS9 (see Comments LPS414 and LPS417). Leekbrook should be included as part of Leek, to accurately reflect the current and proposed role of the settlement in meeting development needs in Leek, including proposed site allocations and the intrinsic links between the two settlements. However, if the Inspector examining the Plan finds that Leekbrook does not form part of Leek for the purposes of the Plan, then it is suggested that as a minimum it should be upgraded from a 'smaller village' to a 'larger village', complete with its own development boundary.</p> <p>The respondent argues that Policy SS9 is far too restrictive in terms of housing delivery in the smaller villages as the policy states that smaller villages shall provide only for appropriate development which enhances community vitality or meets a</p>			No	No	<p>Leekbrook was identified as a smaller village in the Core Strategy. There is no material evidence to indicate that the settlement has become more sustainable for housing development since 2014.</p> <p>Leekbrook's contribution towards Leek's employment land requirement was a principle agreed in the Core Strategy. Industrial estates are often peripheral to the towns that they serve as is the case with the Leekbrook allocations.</p> <p>The supporting text to Policy SS2 explains how the spatial strategy maintains a settlement hierarchy based on Core Strategy Policies SS6/6A/6B/6C so as to create sustainable, self supporting communities. This categorisation of villages was based on their population, services, facilities and capacity for development, and was found sound at Core Strategy</p>	No

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					<p>social or economic need of the settlement and its hinterland.</p> <p>The respondent argues that, in terms of employment development, the proposed approach enabling small-scale new employment development, is inconsistent with other strategies and policies within the Plan, in particular Policies SS5 and E2 which identify allocations within Leekbrook to meet the majority of the employment land requirement for Leek.</p>					<p>examination.</p> <p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS431	Smaller Villages Area Strategy	Policy SS 9	Rebecca Mosley		<p>Respondent expresses concerns regarding the proposed removal of village boundaries. The respondent feels the changes would undermine Core Strategy policies already set out and is at odds with the ethos of conserving the local area.</p> <p>The respondent expresses concern regarding the extent to which community have been informed about the proposed changes.</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p>	No

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										<p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Council has undertaken extensive consultations on the emerging Local Plan full details are given in the Consultation Statements.</p> <p>The Local Plan will replace the Core Strategy.</p>	
LPS509	Smaller Villages Area Strategy	Policy SS9	Miss Karen Landon		Respondent states they have received no public consultation on plans. Respondent objects to the removal of village boundaries as it will involve development on the Green Belt and remove policies contained within the Core Strategy.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt,</p>	No

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										<p>NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy. The Council has undertaken extensive consultations on the emerging Local Plan full details are given in the Consultation Statements.</p>	
LPS495	Smaller Villages Area Strategy	Policy SS9	Ms Dot Merry		Respondent objects to the removal of the village boundaries because it is unsound and not in accordance with the Core Strategy, which protects small/medium/large villages in the Churnet Valley. It also means that the 43 Neighbourhood Plans will become inoperable. Additionally, the respondent objects to development on the Green Belt.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach</p>	No

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										<p>allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p>	
LPS517	Smaller Villages Area Strategy	Policy SS 9	Miss Nicola Derrett		The respondent objects to the Local Plan, particularly the removal of the village boundaries. The proposal to remove the village boundaries does not comply with the Core Strategy and will undermine some of the policies contained within the Core Strategy.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p>	No

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LPS453	Smaller Villages Area Strategy	Policy SS 9	Mr Paul Housiaux		<p>Respondent objects to the removal of village boundaries because it undermines some of the policies and definitions contained in the Core Strategy, as well as the NPPF. It also has the potential to deprive communities seeking to develop Neighbourhood Plans. The proposed Plan is also in conflict with the findings and requirements of the Independent Inspector Mr Whitehead at the public examination of the Core Strategy.</p> <p><i>(Please note that this representation has been redacted because the matter raised is not relevant to the process and there is a separate procedure for raising concerns regarding the conduct of Councillors.)</i></p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District once adopted they will form part of the Development Plan.</p> <p>The Local Plan will replace the Core Strategy.</p>	No
LPS513	Smaller Villages Area Strategy	Policy SS 9	MISS LYNNE BRUNT		<p>Respondent objects to the removal of the village boundaries. The reasons for this are that it will undermine and remove the protection of the policies adopted in the Core Strategy (2014) and renders proposed Neighbourhood Plans inoperable.</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green</p>	No

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										<p>belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p>	
LPS494	Smaller Villages Area Strategy	Policy SS9	B J Warrilow		Respondent objects to the removal of village boundaries, which they feel is unsound. The proposed change will undermine important policies contained within the Core Strategy and render Neighbourhood Plans inoperable.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and</p>	No

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										<p>character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p>	
LPS520	Smaller Villages Area Strategy	Policy SS9	MR VICTOR ROBSON		The respondent objects to the removal of the village boundaries as it will undermine policies within the adopted Core Strategy, undermine strategies related to villages in the Churnet Valley Area and render current proposed Neighbourhood Plans inoperable.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this</p>	No

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										<p>approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan.</p>	
LPS499	Smaller Villages Area Strategy	Policy SS9	Mrs J H Mollart		Respondent objects to development plot in Lower Tean. However, from past experience with the Council they feel their opinion won't be listened to.					No allocations are proposed in Lower Tean. Policy SS9 seeks to allow an appropriate level of sensitive development which enhances community vitality.	No
LPS455	Smaller Villages Area Strategy	Policy SS9	Ms S Marjoram		Respondent objects to the removal of village boundaries. It is not legal or sound, and fails to comply with the adopted Core Strategy.			No	No	<p>The Local Plan will replace the Core Strategy.</p> <p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in</p>	No

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										the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.	
LPS456	Smaller Villages Area Strategy	Policy SS9	Mr S Marjoram		Respondent objects to the removal of village boundaries. It is not legal or sound, and fails to comply with the adopted Core Strategy.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>The Local Plan will replace the Core Strategy.</p>	No
LPS522	Smaller Villages Area Strategy	Policy SS9	Mr		Respondent objects to the removal of village boundaries because it undermines some important policies contained within the			No	No	Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals	No

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			Steele		adopted Core Strategy. The policies it undermines relate to transport and small/medium/large villages in the Churnet Valley, at the same time as making the Neighbourhood Plans inoperable. The Plan is therefore unsound and not legally compliant.					<p>Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan. The Local Plan will replace the Core Strategy.</p>	
LPS524	Smaller Villages Area Strategy	Policy SS 9	Mrs Steele		Respondent objects to the removal of village boundaries because it undermines some important policies contained within the adopted Core Strategy. The policies it undermines relate to transport and small/medium/large villages in the Churnet Valley, at the same time as making the Neighbourhood Plans inoperable. The Plan is therefore unsound and not legally compliant.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the</p>	No

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										<p>1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan. The Local Plan will replace the Core Strategy.</p>	
LPS490	Smaller Villages Area Strategy	Policy SS9	R Finney		<ul style="list-style-type: none"> Respondent objects to the Local Plan and considers it non-compliant with the NPPF. Removal of the village boundaries will lead to development which exceeds limits agreed in the Core Strategy (2014). Development will increase areas of hardstanding leading to increased risk of flooding. Large areas of woodland have been removed in the past few years, leading to landslips and flooding causing road closures in the Churnet Valley. The respondent expresses concern regarding the presence of radon gas, and its effect on public health. The provision of facilities in the area will not compensate for the removal of village boundaries. 			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or</p>	No

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										<p>lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>Policies SD4 and SD5 relate to pollution water quality and flooding.</p>	
LPS492	Smaller Villages Area Strategy	Policy SS 9	CM Merry		Respondent objects to the Plan and asks if it's legal. They question the purpose of the Core Strategy in light of the removal of village boundaries and feels the Local Plan will have an adverse impact on Oakmoor. Additionally they state that if the Plan is adopted, it'll make the 43 Neighbourhood Plans inoperable			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach</p>	No

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										<p>allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan. The Local Plan will replace the Core Strategy.</p>	
LPS496	Smaller Villages Area Strategy	Policy SS9	M Mitchell		<p>Respondent objects to the Plan and questions the purpose of the Core Strategy in light of the removal of village boundaries. The Plan will make the 43 Neighbourhood Plans inoperable. Additionally, they express concern over the impact the Local Plan will have on Oakmoor.</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan. The Local Plan will replace the Core Strategy.</p>	No

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LPS497	Smaller Villages Area Strategy	Policy SS9	F Salt		Respondent feels the removal of the village boundaries is not in the interests of the parishes throughout Staffordshire Moorlands.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	No
LPS500	Smaller Villages Area Strategy	Policy SS9	G Finney-Stewart		Respondent objects to the removal of village boundaries as the approach contradicts the Council's Corporate Plan key aspirations, as well as their 'Shaping the Future' key priorities. Firstly, it is considered urbanisation will not provide a healthier environment for communities. Secondly, development is considered to decrease value for money as urbanisation could cause house prices and tourism to decrease. Thirdly, the 'voice of Staffordshire' would be limited to larger districts without the resolution of small and medium villages or towns being taken into account. Finally, "developing strong and rural communities" (Shaping the Future of Staffordshire 2005-2020) is being ignored as the proposals seek to remove the rural community and replace it with a developed urban community.			No		<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested.</p>	No

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										<p>This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS514	Smaller Villages Area Strategy	Policy SS9	C Brammer		Respondent objects to the removal of village boundaries.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive.</p>	No

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										However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.	
LPS515	Smaller Villages Area Strategy	Policy SS9	C Smith		Respondent objects to Local Plan. The respondent does not support the expansion of villages, which affects the character and nature of the Churnet Valley.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	No
LPS518	Smaller Villages Area Strategy	Policy SS9	M Penberthy		The respondent objects to the removal of the village boundaries as it will remove protection given by policies contained within the Core Strategy relating to small, medium and large villages and transport. Removal of the village boundaries will also render existing Neighbourhood Plans inoperable.			No	No	Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.	No

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										<p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>There are 8 Neighbourhood Plans currently being prepared in the District. Once adopted they will form part of the Development Plan. The Local Plan will replace the Core Strategy.</p>	
LPS530	Smaller Villages Area Strategy	Policy SS 9	Mr Adrichem		Respondent objects to the Plan because the removal of village boundaries is not sound or legally compliant. They have their doubts as to what truly lies behind this change based on their previous experience with SMDC. Additionally, there is no justification in the Plan for the proposed change. Respondent also questions the complexity of the document.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1</p>	No

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										<p>supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS531	Smaller Villages Area Strategy	Policy SS9	Mrs Adrichem		Respondent objects to the Plan because the removal of village boundaries is not sound or legally compliant. They have their doubts as to what truly lies behind this change based on their previous experience with SMDC. Additionally, there is no justification in the Plan for the proposed change. Respondent also questions the complexity of the document.			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach</p>	No

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										allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.	
LPS491	Smaller Villages Area Strategy	Policy SS 9	Mrs G Kenyon		Respondent objects to allocation EN128, particularly its proposed access. This is because Hazelwood Road, Stoney Lane and Brookfield Avenue all merge at this point. Cars are often parked on the street here, making the junction very hazardous. Furthermore, the stretch of road from Hazelwood Road to the junction at Brookfield Avenue is impassable during school times. As such, the proposed access road off this junction would exacerbate the hazardous situation.					The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.	No
LPS532	Smaller Villages Area Strategy	Policy SS 9	Mr N Vitale		Respondent objects to allocation EN128, particularly its proposed access. This is because Hazelwood Road, Stoney Lane and Brookfield Avenue all merge at this point. Cars are often parked on the street here, making the junction very hazardous. Furthermore, the stretch of road from Hazelwood Road to the junction at Brookfield Avenue is impassable during school times. As such, the proposed access road off this junction would exacerbate the hazardous situation.					The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.	No
LPS313	Paragraph	7.69	Mr Gez Willard	Willardwillard Ltd	Respondent would like to remind the Inspector that the 2012 version of the NPPF was well established and applicable when the present SMDC Core Strategy was adopted and the previous (2016) draft Plan prepared.					Comment noted.	No
LPS64	Other Rural Areas Strategy	Policy SS 10	Mr Kenneth Wainman	Ken Wainman Associates Ltd	<p>Restricting development to essential needs in Other Rural Areas is not sound and conflicts with national policy. It also has an adverse effect on rural vitality.</p> <p>The recent Court of Appeal judgement in the Braintree District Council vs. Greyread Limited & Anr case, redefines the definition of “isolated homes” in Paragraph 55 of the NPPF. It ruled that proposals cannot be considered isolated if there are other dwellings nearby. On this basis, new residential development in Other Rural Areas would not be contrary to national policy where it is near existing properties. As such, this policy is contrary to national policy. New rural homes can contribute to social sustainability because of their proximity to other homes and their ability to contribute towards the vitality of nearby villages and service centres.</p> <p>Policy SS2 states that within Other Rural Areas, “there are some groups of houses and hamlets which are not identified as ‘smaller villages’ because of their predominantly open character and loose-knit nature”. The Court of Appeal judgement mentioned</p>	The policy should be amended so that the restriction of essential needs only housing in Other Rural Areas is removed and replaced with the following bullet point: <ul style="list-style-type: none"> “Restricting new build housing development in the countryside to that which has an essential need to be located in the countryside and to limit new housing development on sites near to existing dwellings 	Yes	No	No	<p>The Local Plan reflects the presumption in favour of sustainable development contained in the NPPF and avoids new isolated homes in the countryside unless there are special circumstances.</p> <p>Policy SS2 sets out a settlement hierarchy to ensure that the appropriate scale and type of development is provided in each settlement and other rural areas. It states that within the other rural areas there are some groups of houses and hamlets which are not identified as ‘smaller villages’ because of their predominantly open character and loose-knit nature. Development is generally considered to be inappropriate as they are in locations where there is a very limited range or no services or facilities.</p> <p>H1 supports limited infill development of an appropriate scale and character on the edge of larger and smaller villages. Policy SS10 restricts new build housing development in the countryside to that which has an essential need in accordance with Policy H1. It is not considered appropriate to amend Policy</p>	No

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					above is particularly relevant to such settlements, one example of which is Cheddleton Heath Road, Leek. There have also been appeal decisions nationally which have been allowed in rural areas on the basis that the proposed dwelling is near other dwellings.	in accordance with Policy H1."				SS10 to allow 'limited new housing development on sites near to existing dwellings in accordance with policy H1' as it would be at odds with the spatial strategy and the presumption in favour of sustainable development. (See related comment LPS65).	
LPS239	Other Rural Areas Strategy	Policy SS 10	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) note that extra care housing is a recommendation for the Anzio Camp. Due to its isolated location this may not support an independent living model in relation to accessibility to a range of services and amenities. For extra care to be considered here it is recommended that the developer be required to evidence a demonstrable need for such provision in this area and how they could address its isolated location in relation to day to day services and amenities.					Policy reflects permission for the site which was subject to scrutiny in terms of suitability at the time. nevertheless, the policy merely lists uses which "may" be suitable. Should a new application be forthcoming on the site, the suitability of uses would be subject to consideration again having regards to wider Local Plan policies.	No
LPS285	Other Rural Areas Strategy	Policy SS 10	Ms Christina Sinclair (Historic England)		The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board. Heritage assets make a positive contribution to the quality of the countryside, which has been acknowledged elsewhere within the Local Plan. There should therefore be a dedicated bullet point addressing the conservation and enhancement of heritage assets in this section. Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). Their further comments in relation to the Council's response to this representation were: "This advice was offered in line with paragraph 156 (NPPF)".	Historic England recommend the addition of a new bullet point to section 3 of this policy as follows: "Conserving or enhancing the significance of heritage assets and their setting, based upon a sound understanding of their significance".				This wording is contained in Policy DC2 'The Historic Environment' and it is not considered necessary to repeat it in this policy as the plan should be read as a whole.	No
LPS314	Other Rural Areas Strategy	Policy SS 10	Mr Gez Willard	Willardwillard Ltd	See Comment LPS316. This policy is not in line with Policy H1. Provision should also be made for the sub-division of existing large houses which are out of settlement. Such provision will provide in a sustainable way, the more efficient use of existing housing stock as the sustainable 'cost' in the built fabric will have already been met. The allowance for such organic change meets the needs of changing demographics at the same time as sustaining rural life. Development in isolated locations should not be prevented, in line with national rural housing policy as established by the Class Q conversion policy allowances for the conversion to residential of agricultural buildings.					The Local Plan reflects the presumption in favour of sustainable development contained in the NPPF and avoids new isolated homes in the countryside unless there are special circumstances. The sub-division of an existing existing residential dwelling will create a new residential unit. Policy H1 therefore allows for the sub-division of an existing residential dwelling if it is not in an isolated location.	No
LPS144	Churnet Valley Strategy	Policy SS 11	Mr J Steele		This strategy contains a contradiction and is therefore unsound. It seeks to promote tourism but contains no measures to limit the impact tourism will have on private vehicle use. It also fails to offer any evidence as to how it will practically improve road access or support alternative means of transport.			No	No	Para 28 NPPF refers to supporting 'sustainable' rural tourism, in 'appropriate locations'. Original Core Strategy Pol E3, which also expected new tourism proposals to be located within tourist areas, or sustainable locations, was found sound by Examination inspector. The Churnet Valley is identified as an area for sustainable tourism under Policy SS11, in accordance with the adopted Churnet Valley Masterplan. The Masterplan is predicated on	No

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										<p>sustainable tourism and principles include improving accessibility through promoting sustainable modes of transport. In addition a sustainability appraisal informed the preparation of the Masterplan, including appraisal of various development options throughout the Churnet Valley. The Council considered that a 'Balanced Approach' which focuses development on key locations and sees minimal development elsewhere, recognising the sensitivity and unique qualities of each of the character areas is the most appropriate approach in terms of a balance between sustainability and economic impact.</p> <p>Tourism schemes may be required to contribute to transportation improvements as per Local Plan Policies T1, T2 (and more generally SS12).</p>	
LPS317	Churnet Valley Strategy	Policy SS 11	Mr Gez Willard	Willardwillard Ltd	This policy is generally supported by the respondent. However, it would be made more helpful to the ambitions of the Council to grow tourism if the policy made clear that additional accommodation and or small scale commercial tourist related developments close to (but not within) the Churnet Valley would be supported. Additional text could be added to the end of the policy, reading: "Additional accommodation and or small scale commercial tourist related developments close to but not within the Churnet Valley would be supported as well if it was clear that such uses would support and bolster the Churnet Valley as a tourist destination".					<p>Comments noted. Para 28 NPPF refers to supporting 'sustainable' rural tourism, in 'appropriate locations'.</p> <p>The Local Plan (and Churnet Valley Masterplan) provide an indicative Masterplan boundary to help determine whether tourism proposals fall within the Valley area, therefore whether Policy SS11 would apply. In other cases, Pol E4 would apply (note this provides support to rural tourism proposals beyond existing tourism areas or settlements where such a location can be justified).</p>	No
LPS251	Paragraph	7.76	Mr Kazi Hussain	Planning Specialist Environment Agency	The Environment Agency (EA) are pleased to note that the majority of comments from the previous consultation have been incorporated into the Submission Version document. 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.					<p>Comments noted. It is considered that this is not necessary as the supporting text to Pol SS12, and Section 10 of the Local Plan already establishes the link between infrastructure required to enable the Local Plan to be delivered, and the content of the IDP. The IDP is periodically updated to reflect changing circumstances following consultation with the EA and other stakeholders. Note that Section 8 of the latest IDP already identifies necessary infrastructure as regards flood risk and drainage.</p>	No
LPS121	Planning Obligations and Community Infrastructure Levy	Policy SS 12	Mr T A J Campbell		This policy only deals with one aspect of government guidance on obligations. To accord with Paragraph 204 of the NPPF it should include reference to the other two tests.	The first sentence of this policy should instead read: "Development proposals will be required to provide, or meet the reasonable costs of providing, the on-site and off-site infrastructure, facilities and/or mitigation necessary to make a development acceptable in planning terms through the appropriate use of planning obligations and/or conditions which are directly related to the development and also fairly and reasonably related to it." The following sentence beginning "Standard formulate..." should be deleted, and the sentence	Yes	No	Yes	It is not necessary to repeat national policy.	No

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						beginning "The Developer Contributions..." retained.					
LPS211	Planning Obligations and Community Infrastructure Levy	Policy SS 12	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	The larger allocation policies in the Plan include references to 'masterplanning' within which infrastructure needs are listed. However, there is no requirement setting out how this infrastructure will be delivered/funded (e.g. requiring a single application or a strategic legal agreement covering infrastructure across the whole site). Staffordshire County Council (SCC) therefore express concern over delivery of infrastructure and the application of CIL Regulation 123. They do, however, acknowledge that the Government at the time of writing is consulting on changes to the NPPF and developer contributions. On the latter the Government sets out proposals to remove restrictions in Regulation 123 but only if three criteria are met (see 'Supporting housing delivery through developer contributions' consultation document). The proposed changes to the CIL regulations would address SCC's concerns if Staffordshire Moorlands fell into one of the three criterion. However, at present it is unclear whether criterion 2 or 3 apply to the Moorlands and what the Council's position is, on adopting CIL. SCC request some clarity, culminating in a Statement of Common Ground (SOCG).					The Local Plan encourages joint work between respective land owners of sites. The Council is also mindful of the proposed removal of the pooling restrictions for S106 agreements and understands that at least one of the proposed exemptions from the restriction may apply. The District Council continues to work with the County Council to ensure that necessary infrastructure can be funded through development where appropriate and necessary.	No
LPS319	Planning Obligations and Community Infrastructure Levy	Policy SS 12	Mr Gez Willard	Willardwillard Ltd	This policy is understandably short on detail. However, considerable care is needed in adopting a policy approach which is not considered too aggressive and unreasonable, given local market conditions and development viability.					The text makes it clear that viability will be a key consideration in applying the policy.	No
LPS430	Planning Obligations and Community Infrastructure Levy	Policy SS 12	Mr Greg Powell	Cheadle Unite	Cheadle Unite have questions over the money set aside for planning obligations (106 agreements) made between developers and SMDC. They would like to know where the money is being spent.		No	No	No	Monies collected in response to the policy will be spent to make development acceptable in planning terms, necessary to make the development acceptable in planning terms, where the scheme is directly related to the development and it is fairly and reasonably related in scale and kind to the development.	No
LPS254	Paragraph	8.9	Ms Melanie Lindsley	Planning Liaison Manager The Coal Authority	The Coal Authority supports the acknowledgement in this paragraph that the area has a history of coal mining activity which may impact on surface stability, and that developers should consider this issue and propose any remedial measures necessary.		Yes	Yes	Yes	Support noted.	No
LPS230	Paragraph	8.10	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	From a minerals and waste perspective, Staffordshire County Council (SCC) consider the Plan sound. SCC support this paragraph.				Yes	Support noted.	No
LPS92	Sustainable Use of Resources	Policy SD 1	Roslyn Deeming (Natural England)	Natural England	Natural England welcomes the addition to this policy of the first point. The inclusion of this point follows the advice set out in Paragraph 112 of the NPPF. The Plan is therefore sound.		Yes	Yes	Yes	Comments noted.	No
LPS231	Sustainable Use of Resources	Policy SD 1	James	Spatial Planning	From a minerals and waste perspective, Staffordshire County Council (SCC) consider the Plan sound. SCC support this policy,			Yes		Support noted.	No

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			Chadwick	Policy Officer Staffordshire County Council	particularly part 6.						
LPS241	Sustainable Use of Resources	Policy SD 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) note that this policy refers to adaptation in relation to climate change. However, the policy does not cover how it will be addressed in new developments. Policy H1 could be better linked to Policy SD 3.					Pol SD1 part (5) requires applicants to demonstrate they have considered the sustainability aspects of their schemes from the outset. Do not consider that a specific link needs to be made to Policy H1. Paragraph 1.13 states that 'Whilst the Local Plan provides numerous individual policies on a wide range of planning matters, the development Plan should be read as a whole during the consideration of planning applications'.	No
LPS256	Sustainable Use of Resources	Policy SD 1	Ms Melanie Lindsley	Planning Liaison Manager The Coal Authority	The Coal Authority is pleased that criterion 3 of this policy relates to coal mining legacy and states that this issue must be appropriately addressed in order to demonstrate that the site is safe and stable for the development proposed.		Yes	Yes	Yes	Support noted.	No
LPS366	Sustainable Use of Resources	Policy SD 1	Mr Paul Hill	RPS Planning & Development	This policy introduces a sequential approach to BMV land, which is inconsistent with the NPPF and should be deleted. RPS consider that a more effective way to increase energy efficiency and low carbon sources would be to implement an energy hierarchy, including a 'fabric first' approach before considering the requirement for renewable energy on site which can have significant cost implications. This would ensure a limit on the CO2 produced from the construction stages and in the later operational stages of development.			No		Pol SD1 Part(1) is consistent with para 112 NPPF. Pol SD1 part (5) already requires applicants to demonstrate they have considered the sustainability aspects of their schemes from the outset. The NPPF requires that Plans be deliverable and policy burdens not threaten the viability of development; and that only policies that provide a clear indication of how a policy maker will react to proposals, should be included. For these reasons the inspector to the Core Strategy examination required substantial revisions to original policies SD1-SD2 (which proposed a number of sustainability requirements within new development). Local Plan Policies SD1 and SD3 therefore <i>support</i> rather than <i>require</i> sustainability measures in most cases. As part of the Government's intention to streamline housebuilding standards and remove financial liabilities upon developers it introduced a number 'national technical standards' pertaining to access, space, and water efficiency in new dwellings to be used in conjunction with Building Regulations (which have 'tightened' with regards thermal efficiency since 2010). The Deregulation Act 2015 also removed powers under the Planning and Energy Act 2008 for Councils to set policy requirements in excess of building regulations regarding renewable energy generation or energy efficiency.	No
LPS426	Sustainable Use of Resources	Policy SD 1	Mr Greg Powell	Cheadle Unite	As of November 2017, SMDC have presented no mitigating evidence to residents that it is working to reduce its CO2 that currently sits at the highest band in the National Atmospheric Emissions Inventory. Examples would include a strategic partnership with Stoke-on-Trent focusing on the re-use of brownfield sites where proven road infrastructure, community transport and local employment already exist. Further, SMDC are proactively promoting a development strategy against the majority of wishes of the local community in the full		No	No	No	The Local Plan should include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. The supporting text to Policy SS2 explains how the spatial strategy maintains a settlement hierarchy based on Core Strategy Policies SS6/6A/6B/6C so as to create sustainable, self supporting communities, so reducing the need to travel as per paras 30, 95 NPPF. The Local Plan also contains policies that	No

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					knowledge that the limited 'B' road infrastructure around Cheadle is going to lead to extreme congestion and increased toxic gas emissions and health hazards.					<p>support both provision of further renewable/low carbon energy installations; and greater energy efficiency in new or existing buildings. The above Policies were deemed sound by the Core Strategy Inspector.</p> <p>Neighbouring authorities such as Stoke on Trent have their own requirements to meet regarding future housing, industrial land etc. The Council has published its Duty to Cooperate Statement on its website, which provides an overview of how the Council has met its obligations under Duty to Cooperate. It provides details of strategic cooperation matters and partnership working with relevant bodies including neighbouring authorities, that have shaped the Local Plan and will assist in its delivery.</p> <p>Pol SS7 (in conjunction with Poles T1 and T2) seeks to address traffic related issues in the town centre and along the A521 and A522 by working with partners to develop and implement transport improvements and by safeguarding the route of a potential future link road. The Council commissioned SCC to produce the Cheadle Transport Study, the recommendations of which will inform such measures. SCC's local priorities with regards highways works are set out in its Integrated Transport Strategy for the Staffordshire Moorlands.</p> <p>If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development.</p>	
LPS242	Sustainability Measures in Development	Policy SD 3	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	When referring to communal micro renewables and district heating, Staffordshire County Council suggest that SMDC could reference decentralised renewable energy sources for large scale developments.					<p>Comments noted. Policy SD2 and SD3(1) already cover (decentralised) renewables; but the Policy will be amended slightly at Part(1):</p> <p>"1. Supporting developers who propose exceeding the thermal efficiency or water conservation standards required by law for new buildings or extensions, at the time of the application. In the case of larger developments such as housing estates the Council will support measures such as 'communal' micro-renewables, or District Heating installations."</p>	Yes
LPS320	Sustainability Measures in Development	Policy SD 3	Mr Gez Willard	Willardwillard Ltd	<p>The adoption of this policy is generally welcomed by the respondent.</p> <p>It is, however, suggested that the Council give consideration to supporting exemplar residential or commercial projects which can prove their environmental benefit and low carbon footprint, as well as serving educational projects for the wide community and especially schools. A new policy to this end might read: "As an exception to other policies within the Plan, support will be given to small scale (under 3 units) one off residential or commercial</p>					<p>Comments noted. Schemes proposing further energy/carbon saving (for example through thermal efficiency, or on site renewables) would be supported under Pol SD3 (and NPPF paras 95-98) subject to compliance with wider policies. Also para 55 NPPF sets out policy for housing of exceptional quality or innovative design.</p>	No

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					projects where the scheme can demonstrably deliver a very low carbon (zero target) energy efficient design which makes provision during its planning and construction and thereafter as a showcase to local school, educational establishments and interested community groups."						
LPS367	Sustainability Measures in Development	Policy SD 3	Mr Paul Hill	RPS Planning & Development	<p>This policy does not provide any indication as to what approach the Council will take where development does not provide carbon saving or water saving measures</p> <p>RPS consider that a more effective way to increase energy efficiency and low carbon sources would be to implement an energy hierarchy, including a 'fabric first' approach before considering the requirement for renewable energy on site which can have significant cost implications. This would ensure a limit on the CO2 produced from the construction stages and in the later operational stages of development.</p>			No		Pol SD1 part (5) already requires applicants to demonstrate they have considered the sustainability aspects of their schemes from the outset. The NPPF requires that Plans be deliverable and policy burdens not threaten the viability of development; and that only policies that provide a clear indication of how a policy maker will react to proposals, should be included. For these reasons the inspector to the Core Strategy examination required substantial revisions to original policies SD1-SD2 (which proposed a number of sustainability requirements within new development). Local Plan Policies SD1 and SD3 therefore <i>support</i> rather than <i>require</i> sustainability measures in most cases. Proposals not providing the measures identified in SD3 would not be in conflict with that policy.	No
LPS190	Paragraph	8.20	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	<p>United Utilities is supportive of the amendments made to Policy SD4 (Pollution) and the inclusion of Paragraph 8.20 in relation to Groundwater Source Protection Zones. United Utilities recommend that the supporting text to SD4 (specifically Paragraph 8.20) makes clear reference to a potential need for extra technical mitigation measures which could increase construction costs. They suggest the following amendment (changes shown in bold): "Groundwater is a vital resource supplying about a third of the Country's drinking water, however is often under threat from development pressures. In order to protect the quality of this water resource the policy also sets out expectations concerning risk assessments and mitigation strategies with schemes. Other Policy requirements continue to apply, eg SD5, with regards SuDS requirements, green infrastructure etc. Applicants should note that the mitigation strategy for development in groundwater protection zones could result in increased construction costs for example, through higher specification sewerage pipework. For more detailed guidance, applicants should refer to the Groundwater Protection Guides on Gov.uk (or any subsequent iteration of guidance on development in Groundwater Protection Zones). Early consultation with the Environment Agency and the relevant water company is also encouraged."</p>					<p>It is agreed to make amendments to para 8.20 to state:</p> <p><i>"..Other Policy requirements continue to apply, eg SD5, with regards SuDS requirements, green infrastructure etc. <u>More detailed guidance regarding groundwater mitigation strategies etc is available in the Groundwater Protection Guides at Gov.uk (or any subsequent iteration of guidance on development in Groundwater Protection Zones). Early consultation with the Environment Agency and the relevant water company is also encouraged.</u>"</i></p>	Yes
LPS252	Paragraph	8.23	Mr Kazi Hussain	Planning Specialist Environment Agency	<p>The Environment Agency (EA) are pleased to note that the majority of comments from the previous consultation have been incorporated into the Submission Version document. In this paragraph there is a recommendation of an 8m buffer for main rivers and a 4m buffer for non-main rivers. However, this is a minimum and the EA recommend a larger buffer to make space for water during high flow events and allow the green corridor function of the river.</p>					Comments noted. Environmental permitting is a separate regime and it is considered that para 8.23 already draws the developer's attention to the buffer issue and the Council's expectation that developers discuss this with the EA and LLFA at pre-application stage (and that subsequently buffers may be required on-site based on EA/LLFA advice).	No
LPS202	Paragraph	8.24	Mrs C		<p>With regard to the first sentence in this paragraph, there are already a number of culverts in the immediate vicinity of Site EN128. These must not be added to.</p>			No		Comments noted. Note that Local Plan Policy SD5 on flood risk, expects wherever possible, development to open up any culverted watercourses on site to increase flood water storage and create a green corridor. Also the additional culverting of	No

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			Burton							watercourses will not normally be permitted.	
LPS186	Paragraph	8.25	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	United Utilities supports the strengthening of Policy SD5 and proposed wording under paragraphs 8.25-8.27. Whilst United Utilities preference would be for the wording to be incorporated within the main body of Policy SD5, United Utilities is supportive that the wording is included to support Policy SD5. That said, United Utilities recommend Paragraph 8.25 is amended so that the order of priority for surface water discharge includes reference to a highway drain. The third criterion should state (changes shown in bold): "An attenuated discharge to public surface water sewer or highway drain ."					Comments noted. Agree to amendment as proposed.	Yes
LPS187	Paragraph	8.26	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	United Utilities supports the strengthening of Policy SD5 and proposed wording under paragraphs 8.25-8.27. Whilst United Utilities preference would be for the wording to be incorporated within the main body of Policy SD5, United Utilities is supportive that the wording is included to support Policy SD5.					Support noted.	No
LPS188	Paragraph	8.27	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	United Utilities supports the strengthening of Policy SD5 and proposed wording under paragraphs 8.25-8.27. Whilst United Utilities preference would be for the wording to be incorporated within the main body of Policy SD5, United Utilities is supportive that the wording is included to support Policy SD5.					Support noted.	No
LPS229	Paragraph	8.27	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) suggest the inclusion of a hyperlink in this paragraph, to the LLFA webpage: https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx .					Agree to this amendment.	Yes
LPS253	Paragraph	8.27	Mr Kazi Hussain	Planning Specialist Environment Agency	The Environment Agency (EA) are pleased to note that the majority of comments from the previous consultation have been incorporated into the Submission Version document. The Updated Flood Map for Surface Water has been superseded by the Risk of Flooding from Surface Water map. As such, the reference to the 'Updated Flood Map for Surface Water' in this paragraph should be changed accordingly.					It is agreed that this out of date term can be updated as suggested.	Yes
LPS189	Flood Risk	Policy SD 5	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	United Utilities supports the strengthening of Policy SD5 and proposed wording under paragraphs 8.25-8.27. Whilst United Utilities preference would be for the wording to be incorporated within the main body of Policy SD5, United Utilities is supportive that the wording is included to support Policy SD5.					Support noted.	No
LPS228	Flood Risk	Policy SD 5	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) acknowledge that the majority of their suggestions as Lead Local Flood Authority have been incorporated into the Plan. However, to ensure a consistent approach across Staffordshire in relation to the standards expected for SuDS, SCC request the addition of text to this policy referencing the SuDS handbook. There suggestion is as follows (changes shown in bold): "Developers should undertake early discussions with the Lead Local Flood Risk Authority and have regards to the LLFA SuDS Handbook to ensure that SuDS can be full integrated into the final development layout."					Comments noted. It is considered that this is not necessary as the supporting text at para 8.27 already references this.	No

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LPS286	New Employment Development	Policy E 1	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>References are made in this policy to protecting the character or appearance of areas. Historic England recommend the widening of such references to include all heritage assets and their settings. Considering the issues identified with vacant mills, Staffordshire Moorlands may also wish to consider reference to the potential reuse of historic mills for employment purposes.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>					<p>This wording is contained in Policy DC2 'The Historic Environment' and it is not considered necessary to repeat it in this policy as the plan should be read as a whole. It is not considered appropriate to refer to the potential use of historic mills for employment purposes as viability is a key concern. The Staffordshire Moorlands is a relatively low value area. For instance, 2 mills in Biddulph (with no historic interest) have been deemed unviable for residential development without subsidy.</p>	No
LPS381	New Employment Development	Policy E 1	Ms Carolyn Walker		<p>This policy states that redevelopment can only be permitted when a site can demonstrate that it is no longer suitable or viable. The application being made by St Modwen under DSR1 is mixed use. As such, it appears that they are using the application to change the classification of the land. Furthermore, the Plan shows that there is a requirement for around 150 dwellings in the Blythe Bridge & Forsbrook area until 2031. Why, therefore, is the scale of development mentioned previously required?</p>	<p>In accordance with the NPPF, the Council should take into consideration the need to promote sustainable patterns of development. Thus smaller, well located sites close to towns and village boundaries should be considered for development.</p>		No	No	<p>Policy E3 with regards losses of employment land would not apply to sites formally allocated in the Local Plan (see Part (A)). Blythe Vale is formally allocated with its own strategic site-specific policy (DSR1) which sets out the forms of development expected on site.</p> <p>Planning application SMD/2017/0512 was assessed against relevant Core Strategy, NPPF, and Submission Version Local Plan policies.</p> <p>The Policy DSR1 site (listed under Policy H2), responds to a rural (not Blythe Bridge/Forsbrook) housing requirement (of 881) as set out in Policy SS4. It is considered the site is sustainably located, and sustainable transport measures are required under Policy DSR1. Note that, unlike other areas surrounding Blythe Bridge/Forsbrook, Blythe Vale does not fall within the Green Belt, which requires more onerous justification to allocate at Examination.</p>	No
LPS171	Paragraph	8.36	Jacquie Leach		<p>The development in Cresswell is unacceptable. SMDC have not presented what the government or local people want through their policies. They have chosen one place to leave their commitments, without any regard to the health and safety of Cresswell residents.</p>	<p>The Blythe Business Park application should be revoked.</p> <p>The SMDC planning officer recommended refusal for the Blythe Business Park application, one of the reasons being the settlement hierarchy. The Planning Committee ignored this and the application was passed. The Government Ombudsman said that this was the worst case they had seen in 25 years of service but nothing could be done</p>	No	No	No	<p>The site in question has been through due process and have the benefit of planning consent. The Local Plan takes account of all sites with planning consent in terms of commitments.</p> <p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. All stages of the Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p>	No

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						until the police investigation had concluded. Several members of the Planning Committee have been investigated. The Local Plan cannot be accepted until all legal procedures are followed. VVSM wanted to take this to Judicial Review and they had the support of a barrister but they could not continue because they hadn't raised the £40,000 required (they'd raised and spent £15,000).					
LPS410	Employment Allocations	Policy E 2	Wainhomes (North West) Limited		<p>The respondent notes that the Consultation Analysis Report on the Preferred Options (January 2018) justifies non-inclusion of the consultee's site (land off Wardle Gardens) on the basis it is needed as employment land. The respondent argues that the removal of the Leekbrook development boundaries and re-designating this site as open countryside contradicts this approach.</p> <p>The respondent supports the proposed allocations at the land east of Brooklands Way, Leekbrook and the west of Basford Lane, Leekbrook for employment development.</p>			No	No	Comments noted. Pol E3 provides for the protection of existing employment areas across the District (that meet the bullet criteria). This would include sites in the countryside or smaller villages beyond development boundaries. In the case of development proposals on existing Pol E3 sites in the countryside or smaller villages, wider Local Plan Spatial Strategy, design and landscape policies would continue to apply in determination.	No
LPS482	Employment Allocations	Policy E 2	G Bishop		<p>Respondent objects to the development of land alongside Leekbrook House. The village is overrun with factory units, and three sides of the respondent's house faces these units. It's therefore not fair to block the one remaining open side of their house, with more industrial units.</p> <p>Their kitchen looks onto a noisy lorry yard, with vehicles moving 24 hours a day. There is also a bright light that shines into their kitchen. The respondent's lounge overlooks a factory unit, which has recently had a large extension.</p> <p>They note that their objection is late due to not being notified.</p>					<p>The Council is required to demonstrate how it will provide for its residual employment land requirements for Leek to 2031; and the Council considers it appropriate to identify additional employment land for Leek across a range of locations across Leek and Leekbrook, with good access to main roads such as the A520, to provide choice in locations to at least meet this requirement.</p> <p>The Council consults with its internal Environmental Health Team, and the Environment Agency when considering which development sites to proceed with in its Local Plan. Neither objected to the inclusion of this site (although EA suggested a policy requirement for submission of a flood risk assessment). Any subsequent schemes arising on the site would have to conform with the Council's (and NPPF) design, landscape, and amenity policies. Note there is no 'right to a view' under the Planning Acts.</p> <p>Note that issues such as lorry noise and external lighting (where not separately controlled by planning conditions) should be considered under statutory nuisance legislation. Further issues such as the hours of operation of commercial firms using HGVs or coaches (and engine noise) is controlled by the Traffic Commissioners as licensing authority; their powers include imposing traffic regulation conditions to prevent danger to road users and/or reduce traffic congestion and/or pollution.</p> <p>The Council must conduct public consultation concerning its</p>	No

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										emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. All stages of the Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.	
LPS478	Employment Allocations	Policy E 2	Mr M Lovatt		<p>Objects to the planning application for the development of land alongside Leekbrook House. The respondent's kitchen overlooks a lorry yard which is very noisy from the early hours in the morning to late at night. There is also a 24 hour bright spotlight shining into their window. Additionally, their lounge and garden face industrial units. The only room that is not overlooked is their bedroom. However, this is the land proposed for industrial development. To be completely surrounded by development would be unfair. There are already plenty of industrial units.</p> <p>The respondent also makes the point that they were not notified of this proposal.</p>					<p>The Council is required to demonstrate how it will provide for its residual employment land requirements for Leek to 2031; and the Council considers it appropriate to identify additional employment land for Leek across a range of locations across Leek and Leekbrook, with good access to main roads such as the A520, to provide choice in locations to at least meet this requirement.</p> <p>The Council consults with its internal Environmental Health Team, and the Environment Agency when considering which development sites to proceed with in its Local Plan. Neither objected to the inclusion of this site (although EA suggested a policy requirement for submission of a flood risk assessment). Any subsequent schemes arising on the site would have to conform with the Council's (and NPPF) design, landscape, and amenity policies. Note there is no 'right to a view' under the Planning Acts.</p> <p>Note that issues such as lorry noise and external lighting (where not separately controlled by planning conditions) should be considered under statutory nuisance legislation. Further issues such as the hours of operation of commercial firms using HGVs or coaches (and engine noise) is controlled by the Traffic Commissioners as licensing authority; their powers include imposing traffic regulation conditions to prevent danger to road users and/or reduce traffic congestion and/or pollution.</p> <p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. All stages of the Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p>	No
LPS479	Employment Allocations	Policy E 2	Mr P M Nixon		<p>Objects to any development on agricultural land alongside Leekbrook House. The field is Green Belt and the only open space around their house (the other three sides abut industrial development). The respondent notes that they were not notified of this proposal until a much later date from when the consultation began.</p>					<p>Note ADD09 does not fall within the Green Belt.</p> <p>The Council is required to demonstrate how it will provide for its residual employment land requirements for Leek to 2031; and the Council considers it appropriate to identify additional employment land for Leek across a range of locations across Leek and Leekbrook, with good access to main roads such as the A520, to provide choice in locations to at least meet this requirement.</p> <p>The Council consults with its internal Environmental Health Team, and the Environment Agency when considering which development sites to proceed with in its Local Plan. Neither objected to the inclusion of this site (although EA suggested a</p>	No

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										<p>policy requirement for submission of a flood risk assessment). Any subsequent schemes arising on the site would have to conform with the Council's (and NPPF) design, landscape, and amenity policies. Note there is no 'right to a view' under the Planning Acts.</p> <p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. All stages of the Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p>	
LPS480	Employment Allocations	Policy E 2	Mrs P M Nixon		<p>Objects to any development on agricultural land alongside Leekbrook House. The field is Green Belt and the only open space around their house (the other three sides about industrial development). The respondent notes that they were not notified of this proposal until a much later date from when the consultation began.</p>					<p>Note ADD09 does not fall within the Green Belt.</p> <p>The Council is required to demonstrate how it will provide for its residual employment land requirements for Leek to 2031; and the Council considers it appropriate to identify additional employment land for Leek across a range of locations across Leek and Leekbrook, with good access to main roads such as the A520, to provide choice in locations to at least meet this requirement.</p> <p>The Council consults with its internal Environmental Health Team, and the Environment Agency when considering which development sites to proceed with in its Local Plan. Neither objected to the inclusion of this site (although EA suggested a policy requirement for submission of a flood risk assessment). Any subsequent schemes arising on the site would have to conform with the Council's (and NPPF) design, landscape, and amenity policies. Note there is no 'right to a view' under the Planning Acts.</p> <p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. All stages of the Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p>	No
LPS481	Employment Allocations	Policy E 2	Ms L Whittaker		<p>Objects to the development of land adjacent to Leekbrook House (also by their house) because three sides of their house already face industrial units. It would be unacceptable to look out at industrial units from every window of their house. The existing industrial units generate a lot of noise and it wouldn't be fair to have any more.</p>					<p>The Council is required to demonstrate how it will provide for its residual employment land requirements for Leek to 2031; and the Council considers it appropriate to identify additional employment land for Leek across a range of locations across Leek and Leekbrook, with good access to main roads such as the A520, to provide choice in locations to at least meet this requirement.</p> <p>The Council consults with its internal Environmental Health Team, and the Environment Agency when considering which development sites to proceed with in its Local Plan. Neither objected to the inclusion of this site (although EA suggested a policy requirement for submission of a flood risk assessment). Any subsequent schemes arising on the site would have to</p>	No

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										<p>conform with the Council's (and NPPF) design, landscape, and amenity policies. Note there is no 'right to a view' under the Planning Acts.</p> <p>Note that issues such as lorry noise and external lighting (where not separately controlled by planning conditions) should be considered under statutory nuisance legislation. Further issues such as the hours of operation of commercial firms using HGVs or coaches (and engine noise) is controlled by the Traffic Commissioners as licensing authority; their powers include imposing traffic regulation conditions to prevent danger to road users and/or reduce traffic congestion and/or pollution.</p>	
LPS97	Existing Employment Areas, Premises and Allocations	Policy E 3	Mr R Thorneycroft		<p>This policy should be reworded in order to allow for the Council to adapt to changing circumstances over the lifetime of 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.</p> <p>The reference at part (C) to 'substantial' should be removed as the benefits need only outweigh the shortcomings in the normal planning balancing way. Otherwise the bar would be unjustifiably high in terms of demonstrating compliance.</p> <p>Part (D) should be removed as the requirements are too vague to be understood by developers and are unduly onerous.</p> <p>It should also be made clear in this policy that a range of suitable uses will be supported as being policy compliant by the Council, beyond a narrow-focus on B-type uses. It should be made clear that other employment generating uses and development that results in a positive impact on the local economy, will be supported in the first instance without the need to demonstrate compliance with the exceptions at A-D. This should include small-scale retail development, trade counters, food and drink uses, leisure development up to a certain floorspace (e.g. 1,000 sqm), hotel development and non-residential institutions such as nurseries, clinics and health centres.</p> <p>The respondent owns a site in Leek (see Comment LPS93) that could support a small-scale 'top-up' convenience store given its edge-of-centre location in relation to Leek Town Centre. Such a scheme would generate employment and accord with a revised policy as discussed above). Such a development could form part of a mixed-use development with housing and/or retained office accommodation.</p>					<p>Schemes for alternative uses would be considered on their merits against all other applicable Local Plan and NPPF Policies in the event that Part (B) of the Policy is satisfied.</p> <p>The reference to 'substantial' planning benefits to outweigh loss in Part (C) is retained from the 2014 Core Strategy which was found sound by Planning Inspector, and is considered a reasonable policy requirement to justify loss of the finite number of existing employment sites in the District. •</p> <p>The Part(D) expectation for retaining as much employment use on a site as possible when considering mixed uses and 'enabler' schemes, is also retained from the Core Strategy. This Policy approach was also found sound in Policy E4 of the High Peak Local Plan that was adopted in 2016.</p> <p>The supporting text (and glossary) already explain that the Policy now has a wider focus than Core Strategy Policy E2 (which only protected B-Class sites).</p> <p>Where changes of use 'between' different employment uses (not necessarily B-uses) are proposed where there is no 'net' loss, these would be assessed against Local Plan Policy E1 and other policies. Paragraph 8.39 supporting text to Policy E3 also provides clarity on this point. Note that some of the uses referred to in the representation (eg retail, leisure) are additionally affected by town centre protection policies, and may therefore require a sequential demonstration for their creation when not located in a town centre. Note that the site falls <i>outside</i> of the Leek town centre boundary as defined in map A1.3 of the submission version Local Plan.</p> <p>Proposals to develop the children's day nursery would need to be justified against all applicable Local Plan policies including C1 (loss of community facilities).</p> <ul style="list-style-type: none"> • refer to response to LPS93. 	No
LPS321	Tourism and Cultural Development	Policy E 4	Mr Gez	Willardwillard Ltd	This policy is broadly welcomed by the respondent. There is, however, great danger in a largely rural District with poor and declining public transport, to place too much emphasis on the					Comments noted.	No

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			Willard		<p>proximity of sites to public transport modes. Much of the District is rural open countryside with limited public transport and most visitors arrive by private car. The use of a car is essential.</p> <p>Whilst the planning process should actively promote the use of private cars for arrival/departure and accessing tourist attractions wherever possible, it should not seek to prevent development which would rely on such access. Accordingly, the policy wording should be loosened as follows:</p> <p>"In addition:</p> <ol style="list-style-type: none"> 1. New tourist, visitor and cultural accommodation, attractions and facilities will be supported across the whole of the District and especially: <p>A In areas specifically identified for tourism development in the Churnet Valley Masterplan or other relevant documents.</p> <p>B Where they can demonstrate that they promote and encourage the use of other forms of transport and travel than the use of petrol or diesel vehicles. This can be achieved by <u>any</u> of the following:</p> <ul style="list-style-type: none"> • Providing electric vehicle charging points or use of an electric charging vehicle. • Close to public footpaths, cycleways and bridlepaths. • Providing guests with discounts to use local buses. • Encouraging guests to car share or to use local taxis, courtesy vehicles or other similar services. • Lying adjacent to or very close to a village with some basic services or facilities." 					<p>Para 28 NPPF refers to supporting 'sustainable' rural tourism, in 'appropriate locations'.</p> <p>Original Core Strategy Pol E3, which also expected new tourism proposals to be located within tourist areas, or sustainable locations, was found sound by Examination inspector.</p> <p>Policy E4 provides support to rural tourism proposals elsewhere where such a location can be justified. Further, schemes may be required to contribute to transportation improvements (including public transport) under Policies T1 and T2. Pol C1 supports development which encourage electrical battery powered vehicles.</p>	
LPS236	Paragraph	8.46	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) note that the Plan recognises a growing elderly population as a challenge. They suggest the following amendment to this paragraph (changes shown in bold): "The policy seeks to ensure that an appropriate range and type of housing is provided which meets identified needs arising from changes in population structure, including special needs of an ageing population , and promotes higher..."					<p>Agree than an amendment can be made to the supporting text as suggested.</p> <p>This policy seeks to ensure that an appropriate range and type of housing is provided which meets identified needs arising from changes in population structure, including special needs for the elderly <u>of an ageing population</u>, and promotes higher quality.....</p>	Yes
LPS237	Paragraph	8.49	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) support this paragraph. However, there is no supported definition for the term 'flexicare' in relation to housing type as Flexicare was a previous strategy of the County that ended in 2015. Therefore, all reference to Flexicare should be removed from the Plan so as to avoid misinterpretation.					<p>Agree that reference to 'flexicare' should be removed in paragraph 8.49.</p>	Yes
LPS31	New Housing Development	Policy H 1	Mr	Policy Planner	This policy does not reflect how the needs of a parish could be	Policy H1 needs to be clear	No			Amend supporting text to supporting text to Policy H3 (para.	Yes

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			Ian Fullilove	Peak District National Park Authority	met in the National Park (where the parish is split by the National Park boundary and development is controlled by different local planning authorities either side of the National Park boundary). The statement that needs could be met in rural areas if they cannot be met in the areas specified in Policy H3 is therefore misleading and could inadvertently lead to pressure on small settlements split by the boundary when the needs of the wider parish could be met in other, more suitable locations within that Parish.	that exception site development in a rural location such as Meerbrook may not be justified by under delivery in the wider Moorlands, and that potential delivery of housing inside the National Park (e.g. at Upper Hulme, in the same Parish) may negate any need to develop unsuitable exception sites.				8.59) to clarify that affordable housing may also come forward within the National Park which would contribute towards the needs of the District.	
LPS65	New Housing Development	Policy H 1	Mr Kenneth Wainman		See Comment LPS64. The modification suggested in Comment LPS64 should replace Policy H1, 5(b).	See Comment LPS64. The modification suggested in Comment LPS64 should replace Policy H1, 5(b).	Yes	No	No	<p>The Local Plan reflects the presumption in favour of sustainable development contained in the NPPF and avoids new isolated homes in the countryside unless there are special circumstances.</p> <p>Policy SS2 sets out a settlement hierarchy to ensure that the appropriate scale and type of development is provided in each settlement and other rural areas. It states that within the other rural areas there are some groups of houses and hamlets which are not identified as 'smaller villages' because of their predominantly open character and loose-knit nature. Development is generally considered to be inappropriate as they are in locations where there is a very limited range or no services or facilities.</p> <p>H1 supports limited infill development of an appropriate scale and character on the edge of larger and smaller villages. Policy SS10 restricts new build housing development in the countryside to that which has an essential need in accordance with Policy H1. It is not considered appropriate to amend Policy SS10 to allow 'limited new housing development on sites near to existing dwellings in accordance with policy H1' as it would be at odds with the spatial strategy and the presumption in favour of sustainable development.</p> <p>(See related comment LPS64).</p>	No
LPS70	New Housing Development	Policy H 1		Sterling Property Developments Ltd	<p>Sterling Property Developments Ltd. supports the principle of development being acceptable in smaller villages, provided it does not create or extend ribbon development or lead to sporadic patterns of development.</p> <p>Smaller villages often have a valuable contribution to make to the vitality of rural areas, and small scale development provides opportunities for a sustainable population able to support local facilities and services. The Council's recognition that not all of this development should be directed to central areas is welcomed. Removing development boundaries places less pressure on village cores and allows development opportunities to arise organically and be assessed against other material considerations.</p>		Yes	Yes	Yes	Support noted.	No
LPS75	New Housing Development	Policy H 1		The	The Winterton Lodge Partnership supports elements of this policy	The Winterton	Yes	No	Yes	The Local Plan allocates sites for residential development in	No

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				Winterton Lodge Partnership	<p>but would prefer to see some flexibility to allow for the redevelopment of significant brownfield sites in Smaller Villages not allocated under Policy H2. Sites such as the former Cotton College have been identified in the past as potential development sites but have not been promoted through the SHLAA process. Given the Council's current difficulties in demonstrating a 5 year housing land supply, those brownfield sites which are not within the towns or Larger Villages and which have been identified in the past should be revisited. The current wording of Policy H1 may prevent these sites from coming forward, to the benefit of rural areas, unless they are also allocated in Policy H2.</p> <p>In the case of Cotton College, allowing residential development which may technically contravene the wording of section 4 of Policy H1 would provide significant benefits. The Winterton Lodge Partnership would therefore like to see some flexibility introduced into the policy, in relation to brownfield sites in the Smaller Villages.</p>	Lodge Partnership would like to see some flexibility introduced into the policy, in relation to brownfield sites in the Smaller Villages.				<p>order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in the policy.</p> <p>A small windfall allowance of 30 dwellings per annum has been included for sites in the rural area that have not been allocated in H2.</p> <p>Policies SS10 and H1 allow for appropriate redevelopment of previously developed sites in the countryside outside of smaller villages.</p>	
LPS96	New Housing Development	Policy H 1	Mr R Thorneycroft		This policy states that windfall development will be approved where they are located within the identified boundaries of towns and large villages (e.g. Leek). The respondent supports this policy but notes that it is important that Policy E3 is revised in order to facilitate windfall developments over the plan period (see Comment LPS97). This is because Policy E3 does not currently allow for sufficient flexibility.					Policies in the plan should be read in conjunction with each other. Not all sites will be suitable as housing windfall as Policy E3 safeguards suitable employment sites.	No
LPS161	New Housing Development	Policy H 1	Mr R Duncan	Rob Duncan Planning Consultancy	<p>Policy H1 is unsound because it 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.</p> <p>Section 4 of this policy makes provision for limited infill residential development where development adjoins the boundaries of the larger villages, and relates well to the existing pattern of development in both the larger and smaller villages. Yet section 6 of the policy states that where development is located in the Green Belt, national Green Belt policy will apply. The imposition of this requirement will substantially diminish the effectiveness of the policy in delivering the required housing for the rural areas.</p> <p>Applying Green Belt policy to such proposals means that new developments in either the larger or smaller villages will have to amount to 'infill' development (Paragraph 89 of the NPPF). The term 'infill' is not defined within the NPPF or within the Local Plan, but is usually taken to involve development which is enclosed on at least two sides (typically on either side of a site) by built development.</p> <p>Of the twelve larger villages listed in Policy SS8 which are to accommodate the "bulk of the housing requirement of the rural areas", eight (equivalent to 67%) are wholly enclosed by the Green Belt. Some 41% of the smaller villages are also washed over (or proposed to be washed over) by Green Belt. The respondent invites the Inspector to review the proposals maps for the villages</p>	<p>The LPA should abandon the criteria based policy approach to the delivery of new housing within the rural areas, and instead revert to the originally proposed imposition of settlement infill boundaries. The imposition of settlement infill boundaries will provide a far greater degree of certainty in terms of where development can be accommodated, and can furthermore be tailored to the needs of that particular village.</p> <p>If the LPA is unwilling to revert back to its originally intended approach, then it is suggested that section 6 of the policy is removed, as the requirement to also meet national Green Belt policy will render the policy ineffective in delivering the required level of housing for</p>	Yes	No	Yes	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in</p>	No

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					<p>within the Green Belt, in particular the larger villages. It will become evident that very few 'infill' opportunities exist beyond the defined settlement boundaries of those villages enclosed by the Green Belt.</p> <p>Such development would also have to be 'limited' in terms of the quantum of development, in order to comply with the provisions of Paragraph 89 of the NPPF. This will have the effect of constraining any proposals brought forward to, at most, 5 units per site.</p> <p>In conclusion, having regard to the number of units required to be delivered in the rural areas (793) and that the bulk of these are to be within and around the larger villages, and that no obvious 'infill' opportunities on the edges of those villages exist, it is contended that the proposed criteria based policy for delivering new housing in the rural areas is fundamentally flawed. It risks concentrating a disproportionate quantum of development on those villages which are not within the Green Belt, such as Alton and Ipstones.</p>	the rural areas.				<p>the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>Policy H1 allows for 'limited infill residential development' of an appropriate scale and character for the Spatial Strategy outside development boundaries provided it meets the criteria in the policy.</p> <p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Small windfall allowance (30 per year) = 420. Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p> <p>In the green belt, NPPF policy in respect of Green Belt will also apply. This states that in the Green Belt limited infilling in villages under policies set out in the Local Plan is not inappropriate.</p>	
LPS162	New Housing Development	Policy H 1	Mr R Duncan	Rob Duncan Planning Consultancy	Section 5(d) of Policy H1 is unsound because it conflicts with the NPPF. Furthermore, the requirement for buildings to be "suitable and worthy in physical, architectural and character terms for conversion" is unduly onerous. There is no stipulation in Paragraph 55 of the NPPF that buildings should be suitable and worthy in physical, architectural and character terms for conversion. Some reference to physical attributes is made within Paragraph 90 of the NPPF where development is permitted in the	The LPA should amend section 5(d) of Policy H1 by removing the requirement for buildings to be suitable and worthy in architectural and character terms for conversion. The section that requires LPAs to make the	Yes	No	Yes	Do not agree that the wording in part 5d) should be amended as it could lead to unsuitable schemes coming forward for functional buildings allowed to support agriculture or industry, being retained and converted once their useful life has expired.	No

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					<p>Green Belt if it would involve the reuse of a building that is of permanent and substantial construction. A requirement for buildings to be suitable in physical terms for conversion is therefore perhaps reasonable. However, neither paragraphs 55 or 90 of the NPPF require buildings to be worthy in architectural or character terms for conversion, and thus there is direct conflict with the NPPF in this regard.</p> <p>The wording in this section of the policy is based on Policy R2 in the Core Strategy, the explanatory text to which explains that the rationale behind the policy is to ensure that buildings of intrinsic character are safeguarded. Yet the requirement for buildings to be suitable and worthy in architectural and character terms for conversion neither helps nor hinders that aspiration. Instead, it condemns any building not deemed suitable and worthy in architectural and character terms for conversion to eventual dereliction and disuse. This prevents innovative and imaginative design solutions from coming forward. This could have an adverse effect on the character of the area.</p> <p>Paragraph 60 of the NPPF states that local planning authorities should not attempt to impose architectural styles or particular tastes, and that they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. However, this is what the wording of section 5(d) of Policy H1 is doing. It is seeking to dictate the types of buildings which may be converted, precluding imaginative/innovative schemes from coming forward.</p> <p>Lastly, the current wording of this section of the policy requires development to represent the optimal viable use of a heritage asset. This is also unduly onerous, and will have the effect of further limiting the potential for such developments to be brought forward.</p>	<p>optimal viable use of a heritage asset as an alternative (rather than an additional requirement) should also be removed. The respondent suggests the following wording (changes shown in bold): "d) The conversion of rural buildings for residential use where the building is suitable and worthy in physical, architectural and character terms for conversion, or where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets."</p>					
LPS238	New Housing Development	Policy H 1	James Chadwick	<p>Spatial Planning Policy Officer</p> <p>Staffordshire County Council</p>	<p>Parts 3(a) and 3(d) of this policy are supported by Staffordshire County Council (SCC). They are currently preparing evidence to assist in demonstrating need.</p> <p>Additionally, this policy could be better linked to Policy SD 3 because the Plan does not really cover how the sustainable use of resources will be addressed in new developments.</p>					Support noted. Do not consider that a specific link needs to be made to Policy SD3. Paragraph 1.13 states that 'Whilst the Local Plan provides numerous individual policies on a wide range of planning matters, the development Plan should be read as a whole during the consideration of planning applications'.	No
LPS272	New Housing Development	Policy H 1	Alexa Burns		<p>The respondent considers the Plan unsound because section 5(d) of Policy H1 does not comply with the NPPF. It should be amended to refer only to the requirement that the building should be of permanent and substantial construction. Additionally, Core Strategy Policy R2 should not be incorporated into draft Policy H1 in the Plan. It would be much more transparent for policies relating to Green Belt development to be retained as a separate rural policy, as they are in the Core Strategy.</p>	<p>Section 5(d) of the policy should be amended to refer only to the requirement that the building should be of permanent and substantial construction. Additionally, Core Strategy Policy R2 should not be incorporated into draft Policy H1 in the Plan. It would be much more transparent for policies relating to Green Belt development to be retained</p>		No	No	<p>Do not agree that the wording in part 5d) should be amended as it could lead to unsuitable schemes coming forward for functional buildings allowed to support agriculture or industry, being retained and converted once their useful life has expired.</p> <p>Policy R2 has been incorporated into Policy H1 in order to reduce the number of policies dealing with rural housing in the Plan and improve consistency. Green Belt policy is contained within the NPPF.</p>	No

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						as a separate rural policy, as they are in the Core Strategy.					
LPS274	New Housing Development	Policy H 1	Alexa Burns		Respondent considers plan unsound as it is considered Policy H1 does not comply with the National Planning Policy Framework . These inconsistencies are as follows. Firstly, the Framework does not restrict the existing use to which Paragraph 90, bullet 4 applies, whereas draft Policy H1 e) of the emerging Local Plan still refers to non-commercial buildings. Secondly, Paragraph 90, bullet 4 just requires the building to be of permanent and substantial construction, whereas draft Policy H1 e) of the emerging Core Strategy states that the building should be worthy in physical, architectural and character terms for conversion. The respondent also seeks clarity over term 'priority' about Policy E1 questioning if priority over other sites or priority over other uses.			No		Para 90 NPPF explains how rural building conversions in the Green Belt are not automatically inappropriate development against Green Belt Policy. But wider Local Plan (and NPPF) Policies would still apply in assessment of rural conversions in the Green Belt. Note that Policy H1 does not refer to non-commercial buildings. Note that Policy E1 does not refer to prioritisation of rural buildings for commercial uses. Do not agree that the wording in part 5d) should be amended as it could lead to unsuitable schemes coming forward for functional buildings allowed to support agriculture or industry, being retained and converted once their useful life has expired.	No
LPS287	New Housing Development	Policy H 1	Ms Christina Sinclair (Historic England)		The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board. With regard to 5(d), Historic England advise the Council to clarify that when a rural building is a heritage asset (designated or non-designated) or a site which makes a contribution to the setting of a heritage asset, any proposals for residential conversion should be considered against the relevant historic environment policy. Historic England also advise that references to enabling development are removed from the Local Plan, as such development is by its nature contra to planning policy. Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). The further comments they made about the Council's response to this representation were: Enabling development by definition is generally development that would be unacceptable in planning terms but for the fact it would bring public benefits sufficient to justify it being carried out – see more here: https://historicengland.org.uk/images-books/publications/enabling-development-and-the-conservation-of-significant-places/					<ul style="list-style-type: none"> Comments noted. Historic England did not raise any objection to Policy H1 at the earlier Preferred Options stage. It is not considered necessary to cross reference between policies as the plan should be read as a whole. Whilst Part 5 d) of Policy H1 would only allow 'appropriate' enabling development to secure the future of heritage assets it should also be read in the context of the National Planning Policy Framework. 	No
LPS316	New Housing Development	Policy H 1	Mr Gez	Willardwillard Ltd	See Comment LPS316. This policy is not in line with Policy H1. Provision should also be made for the sub-division of existing large houses which are out of settlement. Such provision will provide in a sustainable way, the more efficient use of existing					The Local Plan reflects the presumption in favour of sustainable development contained in the NPPF and avoids new isolated homes in the countryside unless there are special	No

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			Willard		<p>housing stock as the sustainable 'cost' in the built fabric will have already been met. The allowance for such organic change meets the needs of changing demographics at the same time as sustaining rural life. Development in isolated locations should not be prevented, in line with national rural housing policy as established by the Class Q conversion policy allowances for the conversion to residential of agricultural buildings. The text under (f) should read: "f) The subdivision of an existing residential dwelling provided it does not require significant structural works or extensions which would make the change unsustainable."</p> <p>The provision and support given to rural tourism in this policy is noted and strongly supported.</p>					<p>circumstances.</p> <p>The sub-division of an existing residential dwelling will create a new residential unit. Policy H1 therefore allows for the sub-division of an existing residential dwelling if it is not in an isolated location.</p>	
LPS322	New Housing Development	Policy H 1	Mr Gez Willard	Willardwillard Ltd	<p>The Council places much reliance on the self-build housing register. However to determine the market or need for self and custom build housing on this basis is too naive. Many parties who wish to consider such a housing choice will not be aware of such or register or the benefit in being placed upon it. It is therefore considered that it would be better to stimulate demand and respond to demand by granting planning permissions on smaller sites. These can then be taken up by self-builders or to order by custom build teams. The following could also be tried: (1) free pre-application services for those proposing small (under 5) infill housing projects; and (2) inviting local agents and builders to an annual meeting to discuss self-build and custom build housing. Point 2 should be replaced with the following:</p> <p>"The Council will maintain and update a register of those interested in acquiring self-build/custom-build housing plots across the District. It will publish this on its website and annually invite agents and developers/builders in to review the provision and delivery of small housing sites and self-build/custom housing projects within the District and elsewhere. Residential developments of under 5 units will as a matter of fact partially address need. On sites over 5, developers must show what positive steps they can take to promote such housing."</p> <p>Clause (a) is generally a good idea. However, it is limited by the historical ambivalence of the Council to plan for future housing needs. Most housing stock in existence is not suitable of fit for lifetime living yet the need and demand for such housing will grow significantly during the lifetime of the Plan. The following policy approach could be adopted: "There will be an additional presumption in favour of new housing and development that meets the needs of older people and those in need or likely to be in need of care within their communities."</p> <p>With regard to section 4 of the policy, the Council is placing much reliance on this policy to provide for a large number (circa 420) of windfall sites across the District. Due to current local political expediency, the Council has chosen not to draw settlement boundaries to allow for managed and planned growth in larger villages such as Cheddleton. As such, applications will be judged on a case by case basis. This is wholly unsatisfactory and leads to planning by appeal or default. Anecdotal evidence indicates that</p>					<ul style="list-style-type: none"> The Self-build and Custom Housebuilding Act 2015 places a duty on the Council to maintain a register of those wishing to acquire a serviced plot of land and to give suitable development permission to enough suitable serviced plots of land to meet the demand. Policy H1 part 2) regarding self-build states that appropriate provision will be in agreement with the Council and negotiated on a case by case basis . The Council's Annual Monitoring Report will monitor information from the Self-build Register to assess the demand for this type of accommodation in the district. The Council is involving agents/landowners/developers in an Accelerated Housing Delivery Programme for the Staffordshire Moorlands to aid the delivery of housing sites. Agree that adapting to changes in population structure is a key challenge for the Staffordshire Moorlands and there is a need for accommodation to support a growing elderly population. This will mean that there will be an increased demand for specialist housing and adaptations to enable people to remain in their own homes. If new homes are built to the optional access standard in line with Optional Requirement M4(2) of Part M of the Building Regulations, specified in Policy H1 Part 3 d) this will allow sufficient space for homes to be adapted as necessary. The requirement for the optional space standard has been built into the viability study which has assumed that 20% of all dwellings will be required to meet these requirements. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas). Allowances included in the plan are supported by an 	No

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					<p>new housing sites on the edge of villages will be resisted by local communities and the planning committee that serves them, which will prevent the delivery of housing. This is not acceptable in a District that has a history of under-supply of housing. The respondent suggests the following amendments to sections 4 and 5 of this policy:</p> <p>“4) Housing development on sites not allocated for such purposes in Policy H2 will be supported as follows:</p> <ol style="list-style-type: none"> 1. Within the development boundaries of the towns and larger villages, residential development and development on unidentified (windfall) sites will be permitted, subject to compliance with the Spatial Strategy and wider Local Plan policies <p>Residential development of an appropriate scale and character for the Spatial Strategy will be supported, provided that:</p> <p>The development will lie within the (revised) settlement boundaries of a larger or smaller village and be well related to the existing pattern of development and surrounding land uses.”</p> <p>And,</p> <p>“5) In the other rural areas in the open countryside, the following forms of housing development will be permitted;</p> <ol style="list-style-type: none"> 3. Affordable housing which cannot be met elsewhere, in accordance with Policy H3. 4. A new dwelling that meets an essential local need, such as accommodation for an agricultural, forestry or other rural enterprise worker, where the need for such accommodation has been satisfactorily demonstrated and that need cannot be met elsewhere. 5. Proposals for replacement dwellings, provided they do not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling or result in the loss of a building which is intrinsic to the character of the area. 6. The conversion of rural buildings for residential use where the building is suitable and worthy in physical, architectural and character terms for conversion; and where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets. 7. Proposals to redevelop previously developed land provided it is not of high environmental value. 8. The subdivision of an existing residential dwelling 					<p>analysis of such provision since 2006 as follows:</p> <p>Leek: Large windfall allowance (15 per year) = 210. Small windfall allowance (10 per year) = 140</p> <p>Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Biddulph: Large windfall site allowance (20 overall) = 20. Not many brownfield opportunities identified so figure of 20 considered appropriate.</p> <p>Small windfall allowance (10 per year) = 140. Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.</p> <p>Cheadle: Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.</p> <p>Rural: Small windfall allowance (30 per year) = 420. Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p>	

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					provided it does not require significant structural works or extensions which would make the change unsustainable."						
LPS344	New Housing Development	Policy H 1	Mr Martin Webb		<p>Respondent suggests removing the second sentence of H1(3)(b) relating to housing mix. The following reasons are given:</p> <p>Firstly, the assessment undertaken by NLP in Section 7 of the SHMA Update 2017 only looks at the 'need' for house size types, based upon demographic data. Paragraph 50 of the Framework specifically refers to identifying "the size, type, tenure and range of housing that is required in particular locations, reflecting local demand". The assessment does not seek to understand demand, which will be affected by people's aspirations and financial aspirations as much as existing household size. As such the SHMA can only be given very limited weight in establishing a required mix of housing, in the context of Paragraph 50 the Framework.</p> <p>Secondly, development plan policies should not provide effective policy status to evidence documents that do not form part of the development plan, and may be replaced or updated without duly being tested through the independent examination process.</p> <p>Thirdly, requiring developers to provide a specific mix of housing, which may vary quite substantially from market demand, could have significant financial implications in terms of sales values and rates that can be achieved. However no viability testing has been applied to the SHMA's recommendations in relation to the mix of housing, as specifically acknowledged at paragraph 7.77 of the SHMA Update 2017.</p> <p>In addition to concerns regarding housing mix, the respondent argues that it is not clear what evidential basis there is for the proposal to apply the optional standards to all dwellings. Furthermore, the policy does not appear to have been tested as part of a viability assessment. Therefore the policy as drafted is not justified, and does not accord with national planning policy.</p>		No	No	<p>Policy H1 states that Housing mix will be negotiated with the developer based on housing needs as informed by the SHMA and other relevant factors such as available supply and market demand. Site viability has been considered during the preparation of the plan which has included consideration of housing mix.</p> <p>The NPPF states that the Local Plan should be based on adequate, up-to-date and relevant evidence which includes the preparation of a SHMA. However it is considered that this evidence may be updated and agree to the inclusion of the words 'or successor document' in part 3 b).</p> <p>Adapting to changes in population structure is a key challenge for the Staffordshire Moorlands and there is a need for accommodation to support a growing elderly population. The Strategic Housing Market Assessment (SHMA) Update 2017 confirms that the District is expected to see an increase in the over 60 age groups and a sharp increase in the over 70 age groups by 2031. This will mean that there will be an increased demand for specialist housing and adaptations to enable people to remain in their own homes. If new homes are built to the optional access standard in line with Optional Requirement M4(2) of Part M of the Building Regulations, this will allow sufficient space for homes to be adapted as necessary. The requirement for the optional space standard has been built into the viability study which has assumed that 20% of all dwellings will be required to meet these requirements.</p>	Yes	
LPS362	New Housing Development	Policy H 1	Mr Paul Hill	RPS Planning & Development	<p>The Council has introduced a new requirement as part of this policy relating to the provision of self-build housing. However, the Council has not yet provided detailed evidence beyond limited information contained in its 2016/17 AMR of the total need for self-build properties in the District. As such, criterion 2 is not justified and its policy provision does not provide any clear indication to developers of plots in excess of 12 dwellings and what percentage or amount of their sites should contribute towards self-build plots. Additionally, there is limited evidence to demonstrate why Optional Requirement M4(2) of the Building Regulations is included within the policy.</p>	Criteria C and 3(d) of Policy H1 should be deleted.		No	<p>The Self-build and Custom Housebuilding Act 2015 places a duty on the Council to maintain a register of those wishing to acquire a serviced plot of land and to give suitable development permission to enough suitable serviced plots of land to meet the demand. Policy H1 part 2) regarding self-build states that appropriate provision will be in agreement with the Council and negotiated on a case by case basis. This will ensure that the Council will meet its duty and that flexibility is built into the policy.</p> <p>Adapting to changes in population structure is a key challenge for the Staffordshire Moorlands and there is a need for accommodation to support a growing elderly population. The Strategic Housing Market Assessment (SHMA) Update 2017</p>	No	

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										confirms that the District is expected to see an increase in the over 60 age groups and a sharp increase in the over 70 age groups by 2031. This will mean that there will be an increased demand for specialist housing and adaptations to enable people to remain in their own homes. If new homes are built to the optional access standard in line with Optional Requirement M4(2) of Part M of the Building Regulations, this will allow sufficient space for homes to be adapted as necessary. The requirement for the optional space standard has been built into the viability study which has assumed that 20% of all dwellings will be required to meet these requirements.	
LPS411	New Housing Development	Policy H 1	Wainhomes (North West) Limited		<p>Respondent considers the proposed approach as unduly restrictive in that it will not allow smaller villages to meet their needs. There has been no assessment of whether promoting development within the rural areas can increase vitality or sustainability (see LPS414). As such, the decision to removing the existing development boundary for Leekbrook, or other villages, is not justified. There may be sites available which meet the limited criteria set out in Policy H1, but due to their physical characteristics and/or surrounding land uses are effectively located within the built up area of a 'smaller village'. One such example is the respondent's land at Wardle Gardens, which is located within the existing development boundary but would be re-classified as open countryside under the new Local Plan. The site is surrounded by development on all sides, has previously benefitted from planning permission for employment development, and logically forms part of Leekbrook.</p> <p>Therefore if development boundaries are to be removed, the form of settlements will need to be assessed on a site-by-site basis, and a flexible approach will need to be applied to allow for sites which logically form part of a settlement to come forward. The respondent references two recent examples which SMDC could use (Policy 3 of the Cornwall Local Plan and Policy H1 of High Peak Local Plan). These two examples give greater flexibility in order to help meet housing needs.</p> <p>Additionally, the respondent suggests removing the second sentence of H1(3)(b) relating to housing mix. The following reasons are given:</p> <p>Firstly, the assessment undertaken by NLP in Section 7 of the SHMA Update 2017 only looks at the 'need' for house size types, based upon demographic data. Paragraph 50 of the Framework specifically refers to identifying "the size, type, tenure and range of housing that is required in particular locations, reflecting local demand". The assessment does not seek to understand demand, which will be affected by people's aspirations and financial aspirations as much as existing household size. As such the SHMA can only be given very limited weight in establishing a required mix of housing, in the context of Paragraph 50 the Framework.</p> <p>Secondly, development plan policies should not provide effective policy status to evidence documents that do not form part of the development plan, and may be replaced or updated without duly</p>			No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>Policy H1 states that Housing mix will be negotiated with the developer based on housing needs as informed by the SHMA and other relevant factors such as available supply and market demand. Site viability has been considered during the preparation of the plan which has included consideration of housing mix.</p> <p>The NPPF states that the Local Plan should be based on adequate, up-to-date and relevant evidence which includes the preparation of a SHMA. However it is considered that this evidence may be updated and agree to the inclusion of the</p>	Yes

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					<p>being tested through the independent examination process.</p> <p>Thirdly, requiring developers to provide a specific mix of housing, which may vary quite substantially from market demand, could have significant financial implications in terms of sales values and rates that can be achieved. However no viability testing has been applied to the SHMA's recommendations in relation to the mix of housing, as specifically acknowledged at paragraph 7.77 of the SHMA Update 2017.</p> <p>In addition to concerns regarding housing mix, the respondent argues that it is not clear what evidential basis there is for the proposal to apply the optional standards to all dwellings. Furthermore, the policy does not appear to have been tested as part of a viability assessment. Therefore the policy as drafted is not justified, and does not accord with national planning policy.</p>					<p>words 'or successor document' in part 3 b).</p> <p>Adapting to changes in population structure is a key challenge for the Staffordshire Moorlands and there is a need for accommodation to support a growing elderly population. The Strategic Housing Market Assessment (SHMA) Update 2017 confirms that the District is expected to see an increase in the over 60 age groups and a sharp increase in the over 70 age groups by 2031. This will mean that there will be an increased demand for specialist housing and adaptations to enable people to remain in their own homes. If new homes are built to the optional access standard in line with Optional Requirement M4(2) of Part M of the Building Regulations, this will allow sufficient space for homes to be adapted as necessary. The requirement for the optional space standard has been built into the viability study which has assumed that 20% of all dwellings will be required to meet these requirements.</p>	
LPS427	New Housing Development	Policy H 1	Mr G Messenger		<p>The respondent objects to the removal of infill development boundaries included in previous versions of the Local Plan. No explanation has been given for this change, which represents a departure from the Core Strategy. As such, the proposed approach will not provide clarity and certainty to the delivery of small scale new housing in the most suitable locations within villages. Furthermore, this ad-hoc approach to new housing in small villages encourages speculative development, is not efficient and undermines the purpose and role of town planning and planning policy to proactively plan and guide development to the most appropriate and suitable locations. The respondent requests that this representation is read in the context of the previous representations submitted.</p>	<p>The approach to proactively guiding infill residential development in small villages should be revisited to provide certainty and clarity.</p>		No		<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development</p>	No

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										are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.	
LPS556	New Housing Development	Policy H 1	Mr G Messenger		Policy H1 does not provide a definition or any guidance on what constitutes as infill development. This ad-hoc approach to new housing in small villages encourages speculative development, is not efficient and undermines the purpose and role of town planning and planning policy to proactively plan and guide development to the most appropriate and suitable locations. The respondent requests that this representation is read in the context of the previous representations submitted.	The approach to proactively guiding infill residential development in small villages should be revisited to provide certainty and clarity.		No		<p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	No
LPS519	New Housing Development	Policy H 1		Harvest Properties Limited	<p>Policy H1 is unsound insofar as it fails to provide an adequate framework for the delivery of new housing within the District, specifically within the rural areas inclusive of the larger and smaller villages.</p> <p>SMDC originally sought to identify settlement infill boundaries within the larger and smaller villages to ensure housing delivery, but this proved somewhat contentious during the earlier consultation stages. It seems the introduction of a criteria based policy following this feedback, was a means of minimising objections to the Plan. However, the abandonment of the settlement infill boundaries in favour of a flawed criteria based policy, renders the Submission Version Plan unsound.</p> <p>Section 6 of this policy states that where development is located in the Green Belt, national Green Belt policy will apply. However, the imposition of this requirement as well as section 4 of this policy, substantially diminishes the effectiveness of Policy H1 in delivering the required housing for the rural areas. Of the twelve large villages listed in Policy SS8 which are to accommodate the "bulk of the housing requirement of the rural areas", eight (67%) are wholly enclosed by the Green Belt. A substantial number of the smaller villages (41%) are also located within the Green Belt, including land owned by the respondent. The Inspector is incited to review the proposals maps for the larger and smaller villages,</p>	SMDC should abandon the criteria based policy approach to the delivery of new housing within the rural areas, and instead revert to the originally proposed imposition of settlement infill boundaries. The original infill boundary for Rudyard should be reinstated and include Site RU20.	Yes	No	Yes	<p>The omission site is in the green belt in a Smaller Village. The site was in the Site Options consultation 2015.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential</p>	No

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					<p>where it will become evident that very few "infill" opportunities exist beyond the defined settlement boundaries of the larger villages or the smaller villages washed over by Green Belt.</p> <p>As a result of the above, development will have to be limited in order to comply with Paragraph 89 of the NPPF. This will have the effect of constraining any proposals brought forward to, at most, 5 units per site. The previously estimated housing need for the village of Rudyard was, as set out in the Site Options consultation, 10 units. The absence of a settlement infill boundary renders the delivery of this quantum of development highly unlikely, a there are very few viable 'infill' opportunities in the village.</p> <p>Site RU20 remains available for the delivery of new housing, and is the favoured location for new housing by the Parish Council. Additionally, the Green Belt Review confirmed that the site makes a limited contribution in terms of checking the sprawl of built up areas, and that overall impact of development on the site with regard to the purposes of Green Belt, would be limited. However, because of the absence of built development to the east of the site, its development would not be considered 'infill' development and thus would not conform to the provisions of Policy H1.</p> <p>These factors, coupled with the absence of any obvious 'infill' opportunities on the edges of the larger villages, where the bulk of the housings needs of the rural areas are to be accommodated, means the proposed criteria based policy for delivering new housing in the rural areas is fundamentally flawed. It risks concentrating a disproportionate quantum of development on those villages which are not within the Green Belt, such as Alton and Ipstones.</p>						<p>development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested or site allocations. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS512	New Housing Development	Policy H 1	Mr Grant Anderson	Fradley Estates	Fradley Estates (FE) object to this policy because approximately half of the housing in the Rural Areas (where approximately half of the overall population of the District live) is to be achieved on windfall sites. This approach cannot be considered 'positively prepared' or in accordance with the NPPF. It is also not justified when considered against an approach which identifies a range of	The Plan should identify additional housing allocations for the Rural Areas in the largest villages. FE's site at Langton Court/Tregaron Court (WE042 and we043) should be allocated for housing.		No		<p>The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing.</p> <p>In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase</p>	No	

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					<p>allocated sites to meet the identified needs.</p> <p>The sites that come forward under the limited infilling approach, in accordance with Policy H1, will be very small. As such, this approach is unlikely to make a material contribution to the provision of housing in Rural Areas, particularly affordable housing. This is despite the Plan identifying a "high need" in section 4.</p> <p>Furthermore, a strategy that is so reliant (to the extent of 50%) on infill proposals delivering its housing provision will fail to contribute towards the infrastructure required to deliver sustainable communities. The Local Plan should, instead, identify additional housing allocations for the Rural Areas in the largest villages. This will enable the Plan to deliver the necessary development to sustain the future of rural communities. The approach will also facilitate the delivery of more affordable housing and infrastructure, as larger allocated sites will be far better placed to make a meaningful contribution to affordable housing and community infrastructure.</p> <p>Werrington, Cheddleton and Blythe Bridge are the largest villages (in terms of their size and facilities) where the majority of development for the Rural Areas should be allocated. The Local Plan proposes an allocation of 75 dwellings for Werrington. However, given the size and facilities of Werrington, it is capable of accommodating a much greater share of the rural housing distribution. As such, FE's site at Langton Court/Tregaron Court (WE042 and WE042) should be allocated for housing under Policy H2.</p>					<p>affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range.</p> <p>Para. 48 of the NPPF supports and allowance for windfall sites in the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The windfall allowances set out in the policy reflects past trends. Windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas).</p> <p>Allowances in the Rural Area are supported by an analysis of such provision since 2006 as follows:</p> <p>Rural</p> <p>Small windfall allowance (30 per year) = 420</p> <p>Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.</p> <p>Furthermore, it should be noted that the past trends have been achieved in a more restrictive policy context than that now proposed. Core Strategy Policy H1 applied indicative maximum sizes for windfall sites of 9 dwellings within the boundaries of the towns and larger villages and 5 dwellings in the smaller villages. Only exceptionally were larger windfall schemes supported. This upper limit is proposed to be removed and the new Policy H1 encourages the delivery of appropriate windfall.</p> <p>Finally, to allocate additional sites and still support windfall when there is a clear track record of such sites coming forward is more likely to lead to over development and poor planning in terms of infrastructure provision in particular.</p>	
LPS462	New Housing Development	Policy H 1	Mrs Susan Kneill-Boxley	Office and Publicity Manager CPRE Staffordshire	CPRE (Staffordshire) object to this policy in respect of its vagueness and lack of commitment to special groups, as referred to in paragraphs 3(a) and 3(d) of this policy.	<p>With regard to paragraph 3(a), an assumption could be made of such provision on all allocated sites.</p> <p>With regard to paragraph 3(b), CPRE recommend the replacement of the words "should aim to provide" with "must provide".</p>				<p>Policy H1 part 3 a) will apply to all allocated sites.</p> <p>Policy H1 Part 3 b) does not include the wording 'should aim to provide'. It states 'will be required to provide'.</p>	No
LPS541	New Housing Development	Policy H 1	Muller Property Group		The respondent maintains their support for this policy.					Support noted.	No

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LPS441	New Housing Development	Policy H 1	Richard House	Gladman	<p>Gladman is of the view that planning policies should not seek to rigidly apply generic district wide housing mix and density requirements. As such, this policy should be more flexible in order to respond to matters such as the individual characteristics of sites, viability and changes to market conditions over time.</p> <p>With regard to self-build plots, flexibility should be built into this policy to ensure that plots within development schemes are not prevented from coming forward as a result of the lack of demand for such products. Additionally, self-build plots should be seen as part of the affordable housing provision for the site.</p> <p>Lastly, the intention to plan for the housing needs of special groups including older people is noted and welcomed.</p>	Part 1 of this policy should be revised as follows: "New housing development should provide for a mix of housing sizes, types and tenure having regard to the characteristics of the site and development viability...".	Yes	No	Yes	<ul style="list-style-type: none"> Policy H1 part 3 b) does not seek to rigidly apply generic district – wide housing mix and density requirements. The policy states that 'The final mix will be negotiated with the developer....' Policy H1 part 2) regarding self-build states that appropriate provision will be in agreement with the Council and negotiated on a case by case basis and will therefore ensure flexibility is built into this policy. Self-build / custom-build housing will not necessarily be affordable and should be seen as separate to the delivery of affordable housing. However, provision of both types of housing will be determined through negotiation with the Council taking into account development viability and other contributions. Support for housing needs of special groups is noted. 	No
LPS2	Housing Allocations	Policy H 2	Mr Charles Okell		With the proposed housing targets in mind (and with 'soundness' of the Plan paramount), the area by Blythe/Forsbrook villages on the Tean Road (highlighted in the attached) should be considered for housing development with minimal affect on surrounding farmland.					<p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	No
LPS3	Housing Allocations	Policy H 2	councillor christopher wood		The area designated as BDNEW lies in the Green Belt and is a beautiful part of the countryside. However, the Council has not demonstrated that there are exceptional circumstances for incursion into the Green Belt. The site represents (and encourages) urban sprawl which is against Green Belt policy. Respondent would like to speak to the Inspector to further the case for not building on Green Belt land, having put forward alternative sites for development that the Council has not			No		Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. The Core Strategy also acknowledged that some Green Belt release would be	No

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					considered.					<p>necessary to enable sufficient housing growth in Biddulph.</p> <p>The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>The Council's Green Belt Review concludes that BDNEW could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating specifically to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p> <p>The issue of urban sprawl in relation to this part of the site was raised by respondents at the previous consultation stage (Preferred Options 2017). As a result, additional wording was included in the site policy (DSB1) to explicitly mitigate urban sprawl as suggested by the Council's Green Belt Review - "creation of a new settlement edge along the south-western boundary of the part of the site on the west side of the Biddulph Valley Way to prevent urban sprawl over the longer term".</p> <p>Other sites, including brown field sites have been considered as part of previous consultations including sites suggested by Councillor Wood. Allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.</p>	
LPS4	Housing Allocations	Policy H 2	Mr Peter Lockett		<p>Respondent is mainly concerned about entry points to the site, traffic in the area and flooding.</p> <p>With regard to the proposed entry points to the site by Muller:</p> <ul style="list-style-type: none"> • They are not appropriate. For the proposed entry points and any others off the estate to be viable, the estate will need to have double yellow lines. • 1A Paragon Close is half of a semi-detached property. Even if this half of the property is demolished, the opening will still not be wide enough for entry to the site. • Access to this site is very poor. <p>With regard to traffic:</p> <ul style="list-style-type: none"> • Meakin Close is not big enough to accommodate the 					<ul style="list-style-type: none"> • The Highway Authority has not raised any issues which would prevent the development of this site. • Policy DSC 3 states the requirement for a Transport Assessment. • The Highways Authority consider that only a small number of dwellings could be served off the existing estate. Land north of the veterinary practice, west of Tean Road will provide the main access into the site and the internal estate roads should follow the indicative route that is safeguarded for a potential future link road. • Surveys conducted as part of the Cheadle Transport Study took place over a number of weeks to take account of school traffic, Alton Towers traffic and over a bank holiday weekend. • The Phase 2 Study predicts that in 2031 general traffic growth plus additional trips generated by new housing and employment development will cause 	No

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					<p>volume of traffic that development here will bring.</p> <ul style="list-style-type: none"> Development here will increase traffic which is already a problem in Cheadle, especially school traffic. Yet there are no schools proposed on this side of the town, near the development site. The Council should undertake traffic surveys during school term time and not during the school holidays. Approaching the town will be very difficult. The end of Ashbourne Road is too narrow for 2 lorries to pass. <p>With regard to flooding:</p> <ul style="list-style-type: none"> The development site is located near a brook and water-logged. The development of houses here will cause the brook to become a river. Making the houses flood proof will increase their price and they will not be affordable. <p>Other reasons for objection:</p> <ul style="list-style-type: none"> Development at this site will result in a loss of farmland and natural beauty. Respondent is aware that houses have to be built and that the Council is under pressure to provide new housing. However, development in this area was previously rejected at enquiry. Respondent feels that the Plan has changed little since it was rejected several years ago, especially in this area of Cheadle. <p>Other points made by the respondent:</p> <ul style="list-style-type: none"> The entire estate has not had any major work done to it since it was built. The respondent would like to know whether the two oak trees will be removed. 					<p>increased queuing and delays. There is limited scope to change junction characteristics due to the historically confined road structure, however the study recommends a package of mitigation measures which could provide some additional capacity to the overall network.</p> <ul style="list-style-type: none"> Site located in Flood Zone 1 - low probability. There is some evidence of surface water flooding on the southern part of the site so the developer will need to consult with the Environment Agency and the Lead Local Flood Authority as early as possible to discuss SuDs. Policy DSC 3 requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority. Area previously allocated for housing in 1998 Local Plan. Previous application (2000) unsuccessful because link road could not be built within application site and no need for additional housing at that time. The Sustainability Appraisal takes into account Best and Most Versatile Land data provided by Natural England. Policy DSC3 requires mitigation measures identified in the Council's Landscape, Local Green Space and Heritage Impact Study. Policy DSC3 also requires that public open space is incorporated into the development. 	
LPS63	Housing Allocations	Policy H 2	Mr Simon Freisner	Director Ken Wainman Associates Ltd	<p>Site WE013 should be included within the Plan. Policy H2 omits Site WE013 (Little Ash Farm, Ash Bank Road, Werrington) even though it was included in the previous Preferred Options Plan.</p> <p>Site WE013 contains a house, outbuildings, a tennis court and a garden. The existing buildings could be demolished and the entire site redeveloped to provide up to ten houses, including three or four affordable houses. If the existing house and ancillary buildings were to remain, five to six houses, including two affordable houses, could be built on the site. Site WE013 should be included in the Plan, for the following reasons:</p> <ul style="list-style-type: none"> It would provide much needed housing, including affordable housing. Although it is outside of the proposed settlement boundary, it is part of the existing village fabric. 	Site WE013 should be removed from the Green Belt and designated as a rural housing allocation in Policy H2.	Yes	No	Yes	<p>The omission site WE013 is in the green belt and was assessed as a B site in the SHLAA. It was included in the Site Options consultation 2015 and the Preferred Options Sites and Boundaries consultation 2016. The site contains some existing development. The NPPF allows for the development of brownfield sites in defined circumstances.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy</p>	No

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					<ul style="list-style-type: none"> The entire site forms the planning unit which is in residential use. Development at this site would have limited impact on the openness of the Green Belt and not conflict with the purposes of the Green Belt. The existing trees on the south of the site would screen development and a tree belt could be provided on land to the east, which respondent owns. The Landscape, Local Green Space and Heritage Impact Study 2016 concluded that whilst the site is of medium sensitivity, development impact could be mitigated with tree planting on the south-east boundary. A similar comment was made for allocated site WE003, despite the planting having to be more extensive. Development at this site would have less impact on the openness of the Green Belt than allocated site WE003, which has a long frontage along Ash Bank Road with extensive views of the Green Belt. Development in Site WE003 would significantly block views and harm the openness of the Green Belt, more than the development in Site WE013. More allocated sites are needed to meet the likely need for affordable, starter homes and other housing. Site WE013 could provide up to four affordable houses and possibly more starter homes dependent upon viability. The land in Site WE013 could be developed almost immediately. There is existing good access to the house in Site WE013. There is no flood or contamination risk. <p>It is contended that the omission of Site WE013 is unsound for the following reasons:</p> <ul style="list-style-type: none"> The Submission Version Local Plan would not be effective in providing adequate affordable and local needs housing in Werrington. The present proposals, even allowing for recent affordable housing provision in the village, would not meet the village's requirements. There are no published open-market and affordable housing targets for Werrington. This is contrary to the NPPF (para 50) which requires local planning authorities to identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. As such, the Plan is not effective in meeting the village's housing need, particularly its affordable housing need. This amounts to exceptional circumstances, sufficient to justify Site WE013's removal from the Green Belt and inclusion within the Plan, as an allocated site. With regard to the previous bullet point, there is no definition within the Plan of "local demand". Housing targets are set out for the District but not the individual 					<p>H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas including the land off Ash Bank Road in Werrington which is in the green belt. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances justify the release of this site from the green belt.</p> <p>The Council acknowledges the significant need for affordable housing in the Staffordshire Moorlands identified in the Strategic Housing Market Assessment (SHMA). Policy H3 seeks to support the provision of affordable housing across the District through a range of measures which includes a range of measures which includes a proportion of affordable housing on appropriate residential sites.</p> <p>The Environment Agency identified potential flooding issues for this and the adjoining site WE027 in their comments to the Preferred Options Sites and Boundaries consultation 2016 and that the flood risk to the site should be quantified as it may affect the deliverability of the site. Staffordshire Lead Local Flood Authority have it on their records as a 'Flooding Hotspot'</p> <p>The Local Plan includes a residential allocation in Werrington in the green belt. It is considered there are exceptional circumstances regarding this site which justify its release from the green belt to contribute to meeting the District's housing requirement.</p> <p>Werrington is a defined as a larger village in the policy SS2 Settlement Hierarchy. The Green Belt Study considered the residential allocation in Werrington is suitable for release from the green belt if there are exceptional circumstances.</p> <p>The Green Belt is tightly drawn around Werrington and there is limited capacity in the settlement for further growth. The settlement has a number of facilities and services and is considered to be a sustainable location to support some growth. The allocated site in Werrington is owned by the Ministry of Justice and is due to be transferred to Homes England via an approved land transfer programme. Homes England are proposing to carry out work to ensure the delivery</p>	

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					<p>Larger Villages or Rural Areas generally. There is a definition of "Local Needs Housing" in the Plan's glossary, as "housing whose occupation is restricted by a condition or legal obligation to persons (and their dependents) currently resident or working in the local area". In decision-making, the Council currently define "local" as the Parish not the District, when assessing applications for affordable housing in rural areas. The Plan should therefore identify targets for affordable houses for the rural villages – large and small.</p> <ul style="list-style-type: none"> • The site, which is in the Green Belt, is previously developed whereas the two allocated housing sites in Werrington are greenfield sites, also within the Green Belt. The contention that the land is previously developed is based on the High Court judgement Dartford BC vs. Secretary of State for Communities and Local Government (2016). Development is possible on such land, provided that it does not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. • The Green Belt Review states that the site and adjoining site, be "considered for release" (Appendix C – Werrington). • Site WE013 is closer to the centre of Werrington than the other sites, and contiguous with the village. <p>The consultee also makes the following, additional points:</p> <ul style="list-style-type: none"> • The Council's current approach for applications for affordable housing in the Rural Areas is to require the applicant to carry out a housing needs survey as part of the application. For windfall and infill sites, which tend to be small, this is unreasonable and not in accordance with the NPPF. In the past, the Council carried out such surveys. • As a result of the increased reliance in the Plan on windfall and infill sites, and the small number (two) of allocated sites in the village of Werrington, the Plan is not effective and would not provide sufficient affordable houses in the Larger Villages, particularly those such as Werrington which are surrounded by Green Belt. • Reliance on infill sites in the Green Belt, if allowed, would increase ribbon development, particularly along Ash Bank Road. • Werrington is surrounded by the Green Belt and only limited infilling can take place. Given that the Green Belt is outside the proposed settlement boundary, it is unclear whether paragraph 89 of the NPPF (bullet point 5, "limited infilling in villages") would apply. • Policy SS8 (section 2, bullet point 1) states that the Council will meet housing requirements by increasing the range of available and affordable house types. The most recent specific information as to affordable 					of the housing through an appropriate developer. (See LPS337).	

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					<p>housing needs in Werrington is a housing needs survey carried out in 2013. This identified that there was a need for 54 affordable houses in the village. Since then, around 10 affordable houses have been built in the village at Russell Grove on a former school site, and there may be a few others. This still probably leaves around 40-44 houses to be provided.</p> <ul style="list-style-type: none"> The two allocated housing sites in the Plan at Werrington would provide approximately 75 houses, including approximately 25 affordable houses based on Policy H3. This would leave a number of affordable houses to be found. The proposed reliance on windfall and infill sites is unlikely to provide many (if any) sites because there are few sites available within the built-up area and the village of Werrington is tightly constrained by the Green Belt. Infill sites are very small so there would be no requirement for affordable housing. 						
LPS6	Housing Allocations	Policy H 2	Mr A Burrows		<ul style="list-style-type: none"> This is a semi-rural area outside of the town development boundary. One of the attractions of this area in Leek is that the boundaries for development are very closely defined. This means that within 10 minutes walk of the town centre you have access to open space, which makes the Mount area very popular for leisure activities such as walking, jogging and cycling. The fields here provide a home for various types of wildlife and this, together with the farm animals that graze them, provide access to nature very close to the heart of Leek. The combination of these two aspects make an early morning walk or a late evening jog across the Mount an uplifting and almost spiritual experience. The views from the Mount over Leek are spectacular and largely unspoilt. Any development of the type proposed would entirely alter the character of the area, as has been the case with the Buxton Road end of Mount Road. If the development were to proceed, over 340 houses would be constructed on pleasant, open countryside. The access along Ashbourne Road and Mount Road would be inadequate with the volume of traffic generated by the development, especially on the junction where Mount Road meets Ashbourne Road given the development that has already taken place on the old quarry site and the proposed development on the other side of Ashbourne Road near Poplar Service Station. Access via the already existing estate off either Knievden Lane and/or Moorland Road would be impossible to sustain, given the narrow nature of the roads in question and the cars parked on both sides of these roads in what is an already busy residential area. The creation of a "rat run" would have serious safety consequences. Furthermore, public transport via the bus service would be inadequate. 				<p>The public open spaces / Local Green Spaces proposed by the Council are those mapped in the Submission version Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. The Mount sites LE022/ LE066/ LE128/ LE140/ LE142A/ LE142B were all subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>The Council uses evidence to justify its selection of submission</p>	No	

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					<ul style="list-style-type: none"> The proposal for the construction of a new school in the area came as a surprise because most Leek East ward schools are undersubscribed. The volume of traffic that this would create would be chaotic and alter the character of the area. There are other areas of land which would be ideal for development that are brownfield sites within the town centre and the town development boundary. Development of these brownfield sites would not impact on local wildlife and leisure activities, and would be more sustainable as they would not involve significant damage to the environment as a result of increases in traffic in outlying areas. Given the departure from Leek of major employers such as the Britannia Building Society, a large proportion of these new houses would inevitably be homes for commuters for the Potteries conurbation and/or Macclesfield and Greater Manchester. This would have an adverse effect on the character and community feeling of the area, as well as issues in relation to sustainable investment in local infrastructure. Planning conditions stating that occupiers should have a connection with the local area have repeatedly been shown to be unenforceable in the context of urban development. Grant of these applications would set a precedent for further alteration of the town development boundary. Then, in no time, the remaining open space at the Mount would be the subject to further applications on the basis that this land would become "infill" development. There have been applications for planning permission relating to these areas before, most notably in 2007. This was refused on appeal, given the strength of feeling within the local community against this development. Any attempt to alter the town development boundary to facilitate any or all of these proposals should be resisted as there is no proven case that the type or amount of development proposed is justifiable. Given the lack of affordable housing in rural locations, more consideration should be given to this type of development, rather than encouraging urban sprawl which would have an adverse effect on the character of the town. 					<p>Local Plan sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council selects submission Local Plan sites.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022 /LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate). Leek is already served by a number of frequent or less frequent bus routes, connecting to centres such as Hanley, Cheadle, Buxton and Macclesfield. A number of these use main arterial routes such as Buxton Road/Ashbourne/Springfield Road. In some circumstances, major residential developments may be required to contribute to improved bus routes/bus facilities in accordance with Local Plan Pol T1/SM Integrated Transport Strategy.</p> <p>The Council consults with SCC Education during Local Plan preparation, and SCC have indicated a need for additional first and middle- school land provision in Leek resulting from the town's development requirements. These are laid out in the Submission Local Plan. Site ADD01 is identified for the necessary expansion of Churnet View Middle School. Note SCC Education support both the location of the proposed Middle School expansion at Horsecroft; and the location of the new First School on the Mount, in the Local Plan (as the proposed location of the First School adjacent to the high school site offers potential for sharing of facilities e.g. playing fields).</p> <p>The submission Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is</p>	

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										<p>insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.</p> <p>The Moorlands suffers from a shortage of affordable housing; and Local Plan Policy H3 requires that at least 33% of housing on new housing sites be affordable (and a proportion of these be dedicated as starter homes). In addition Policy H1 also sets out the Council's expectations concerning self-build/custom-build housing on new housing sites.</p> <p>Historic planning applications/appeals would have been assessed against Development Plan Policies, and material considerations applicable at that time. The Council is under a legal obligation to assess any planning applications it receives against all applicable Development Plan policies, and relevant material considerations.</p> <p>Need for additional housing stems from a number of factors, for example household formation, in-migration, linkages with future workforce, and other factors. The NPPF makes clear that household projections are the starting point for assessing housing needs; however these additional factors should also be taken in to account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration empty properties in the Moorlands, and the anticipated effects of Brexit. In 2017 the Government announced a public consultation over proposed changes to the way housing need is calculated by Local Authorities.</p> <p>The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible. The Leek requirements are retained from Policy SS3 in the adopted 2014 Core Strategy, which was found sound by Inspector.</p>	
LPS7	Housing Allocations	Policy H 2	Mrs Diane Burrows		<ul style="list-style-type: none"> This is a semi-rural area outside of the town development boundary. One of the attractions of this area in Leek is that the boundaries for development are very closely defined. This means that within 10 minutes walk of the town centre you have access to open space, which makes the Mount area very popular for leisure activities such as walking, jogging and cycling. The fields here provide a home for various types of wildlife and this, together with the farm animals that graze them, provide access to nature very close to the heart of Leek. The combination of these two aspects make an early morning walk or a late evening jog across the Mount an uplifting and almost spiritual experience. 					<p>The public open spaces / Local Green Spaces proposed by the Council are those mapped in the Submission version Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>According to the 2006 Natural Environment and Rural</p>	No

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					<ul style="list-style-type: none"> The views from the Mount over Leek are spectacular and largely unspoilt. Any development of the type proposed would entirely alter the character of the area, as has been the case with the Buxton Road end of Mount Road. If the development were to proceed, over 340 houses would be constructed on pleasant, open countryside. The access along Ashbourne Road and Mount Road would be inadequate with the volume of traffic generated by the development, especially on the junction where Mount Road meets Ashbourne Road given the development that has already taken place on the old quarry site and the proposed development on the other side of Ashbourne Road near Poplar Service Station. Access via the already existing estate off either Knievden Lane and/or Moorland Road would be impossible to sustain, given the narrow nature of the roads in question and the cars parked on both sides of these roads in what is an already busy residential area. The creation of a "rat run" would have serious safety consequences. Furthermore, public transport via the bus service would be inadequate. The proposal for the construction of a new school in the area came as a surprise because most Leek East ward schools are undersubscribed. The volume of traffic that this would create would be chaotic and alter the character of the area. There are other areas of land which would be ideal for development that are brownfield sites within the town centre and the town development boundary. Development of these brownfield sites would not impact on local wildlife and leisure activities, and would be more sustainable as they would not involve significant damage to the environment as a result of increases in traffic in outlying areas. Given the departure from Leek of major employers such as the Britannia Building Society, a large proportion of these new houses would inevitably be homes for commuters for the Potteries conurbation and/or Macclesfield and Greater Manchester. This would have an adverse effect on the character and community feeling of the area, as well as issues in relation to sustainable investment in local infrastructure. Planning conditions stating that occupiers should have a connection with the local area have repeatedly been shown to be unenforceable in the context of urban development. Grant of these applications would set a precedent for further alteration of the town development boundary. Then, in no time, the remaining open space at the Mount would be the subject to further applications on the basis that this land would become "infill" development. There have been applications for planning permission relating to these areas before, most notably in 2007. 					<p>Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. The Mount sites LE022/ LE066/ LE128/ LE140/ LE142A/ LE142B were all subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>The Council uses evidence to justify its selection of submission Local Plan sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council selects submission Local Plan sites.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022 /LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate). Leek is already served by a number of frequent or less frequent bus routes, connecting to centres such as Hanley, Cheadle, Buxton and Macclesfield. A number of these use main arterial routes such as Buxton Road/Ashbourne/Springfield Road. In some circumstances, major residential developments may be required to contribute to improved bus routes/bus facilities in accordance with Local Plan Pol T1/SM Integrated Transport Strategy.</p>	

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					<p>This was refused on appeal, given the strength of feeling within the local community against this development.</p> <ul style="list-style-type: none"> Any attempt to alter the town development boundary to facilitate any or all of these proposals should be resisted as there is no proven case that the type or amount of development proposed is justifiable. Given the lack of affordable housing in rural locations, more consideration should be given to this type of development, rather than encouraging urban sprawl which would have an adverse effect on the character of the town. 					<p>The Council consults with SCC Education during Local Plan preparation, and SCC have indicated a need for additional first and middle- school land provision in Leek resulting from the town's development requirements. These are laid out in the Submission Local Plan. Site ADD01 is identified for the necessary expansion of Churnet View Middle School. Note SCC Education support both the location of the proposed Middle School expansion at Horsecroft; and the location of the new First School on the Mount, in the Local Plan (as the proposed location of the First School adjacent to the high school site offers potential for sharing of facilities e.g. playing fields).</p> <p>The submission Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements are to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.</p> <p>The Moorlands suffers from a shortage of affordable housing; and Local Plan Policy H3 requires that at least 33% of housing on new housing sites be affordable (and a proportion of these be dedicated as starter homes). In addition Policy H1 also sets out the Council's expectations concerning self-build/custom-build housing on new housing sites.</p> <p>Historic planning applications/appeals would have been assessed against Development Plan Policies, and material considerations applicable at that time. The Council is under a legal obligation to assess any planning applications it receives against all applicable Development Plan policies, and relevant material considerations.</p> <p>Need for additional housing stems from a number of factors, for example household formation, in-migration, linkages with future workforce, and other factors. The NPPF makes clear that household projections are the starting point for assessing housing needs; however these additional factors should also be taken in to account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration empty properties in the Moorlands, and the anticipated effects of Brexit. In 2017 the Government announced a public consultation over proposed changes to the way housing need is</p>	

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										calculated by Local Authorities. The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible. The Leek requirements are retained from Policy SS3 in the adopted 2014 Core Strategy, which was found sound by Inspector.	
LPS9	Housing Allocations	Policy H 2	Mr Wainwright		The land at Sunways will be available for development in the later stages of the Plan.		Yes	Yes	Yes	Landowner support for the site noted. The availability of the site towards the end of the plan period has been reflected in the housing trajectory.	No
LPS10	Housing Allocations	Policy H 2	Mrs Wainwright		The land at Sunways will be available for development in the later stages of the Plan.		Yes	Yes	Yes	Landowner support for the site noted. The availability of the site towards the end of the plan period has been reflected in the housing trajectory.	No
LPS20	Housing Allocations	Policy H 2	Jean A Durber		<p>Objects to development at EN128, for the following reasons:</p> <ul style="list-style-type: none"> Site is not suitable for the proposed development. In 1995 the site was designated as an area of Visual Open Space by an Environment Inspector. The site contributes significantly to the open and semi-rural character of the neighbourhood. The site should be retained on amenity grounds. The open space and its view have been abused by the present owner, who has installed fencing and planting along its boundaries. This prevents an open view, to the detriment of the local community. There is a lot of traffic along Brookfield Avenue, especially during school drop-off and pick up times. Development of the site will increase traffic. Furthermore, Brookfield Avenue is in urgent need of upgrading and the renewing of kerbs, footways, surfacing and drainage. There are not enough services in the area to cater for the increase in population that the development will bring. Safety is a major concern, especially during school term time. Respondent expresses concern over safety of children, parents, grandparents and older people from Brookfield, Bassnetts Wood, Cedar Crescent, Stoney Lane and beyond. Brookfield Avenue is currently used as an over capacity car park, despite residents fighting for parking restrictions to be put in place. Even though residents have made complaints, the Council has not done anything to prevent the ongoing problem. It is an accident waiting to happen. Flooding has been experienced along Brookfield Avenue, the A53 and, occasionally, the school playing fields. Site EN128 consists of underlying clay so water will not percolate through it. The groundwater ends up in St Luke's playing fields, and produces situations of 				<p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council</p>	No	

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					<p>water logging. This prevents school sporting activities.</p> <ul style="list-style-type: none"> The loss of this field will result in the loss of wildlife, including wild flowers, grasses and insects. Greenfield sites, woodlands, school playing fields and many places of natural beauty are being lost to development. The loss of these sites is not being considered properly by the Government and Local Authorities. They are gradually being eroded and will, one day, be lost for ever. Existing employment sites are inaccessible from the site. People will have to travel long distances to reach these employment sites, which will have a negative effect. There are nearly 1,200 empty homes in Staffordshire Moorlands, some of which have been empty for up to 10 years. Empty homes can have a negative impact on a community. The Council needs to find a strategy to bring properties back into circulation. This would mean fewer houses being built. The benefit that would be derived from the above point would be additional money in the Council Tax base as well as the New Homes Bonus, received by the Council. This bonus applies not only to empty houses brought back into stream but to all new builds. The value gives a payment of an equivalent Council Tax income to the Local Authority, for six financial years following its return to use. <p>Respondent makes the following suggestions:</p> <ul style="list-style-type: none"> The site could accommodate four or five bungalows for older people, so that their existing homes can be sold to provide family housing. 50% or more of the site could be retained as Visual Open Space. 				<p>uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside." The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>Policy SS8 defines Endon as a larger village. The larger villages are those which are the most sustainable settlements the rural areas with some social infrastructure and employment opportunities and good accessibility to towns and larger centres. Policy SS2 focuses the bulk of rural development in these settlements to maintain their role service centres.</p> <p>The site is allocated for residential development - the nature and type of the development is not specified. Policy H 1 of the Local Plan seeks to ensure there is an appropriate range and type of houses is provided that meets identified needs arising from changes to the population structure including special needs for the elderly. All new dwellings should provide flexible accommodation that is capable of future adaptation. It is therefore not considered necessary to restrict this site for elderly accommodation.</p> <p>The site allocation is required to meet the District's housing requirement, an allowance has been made for windfall sites and site allocations are needed in addition to this to ensure there is sufficient land to meet the housing requirement.</p> <p>The Council has an Empty Homes Strategy which promotes the reuse of empty homes.</p>		
LPS21	Housing Allocations	Policy H 2	Mr John H Durber		<p>Respondent reiterates the fact that local residents and the general community in the vicinity of the proposed EN128 development are very concerned with the impacts that development at this site will bring.</p> <p>Respondent objects to development at EN128 for the below reasons. They have, since 1995, objected to development on this</p>					<p>Previous planning application refusals were assessed under the planning policy applicable at that time.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content</p>	No

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					<p>land. Various planning applications have been submitted and refused on the land since 1984.</p> <ul style="list-style-type: none"> • The land is not suitable for the development of 22/26 houses. • The site was granted Visual Open Space in the mid-nineties. The Department of the Environment Inspector recommended that Dollisfield (EN128) be retained as such. • The Department of the Environment Inspector also said that Dollisfield provides an important contribution to the open and semi-rural character of the neighbourhood and should therefore be retained on amenity grounds. • At the time of the above, the field had a lovely open view aspect. However, over the period following the above statements by the Inspector, the owner erected 2m high fences and a very high, dense hedge. This removed the opportunity for people to view the open space. • Greenfield sites, woodlands, school playing fields and places of natural beauty are being eroded and will, one day, be lost for ever. • Other sites in Endon have been rejected and transferred to Blythe Bridge – a more suitable option. There are other sites (including brownfield sites) in Staffordshire Moorlands that should be considered for development, before areas of natural beauty. • Development of site EN128 will result in the loss of wildlife. • The site will be accessed via Brookfield Avenue, which is overused particularly during school drop-off and pick up times. For example, a survey conducted by two local residents on 5th September 2018 recorded 300 vehicles on the avenue. • During school drop-off and pick up times, people park their cars on the footways on both sides of Brookfield Avenue. Parents also drive without due care along the footpaths, turning around in residents' driveways, parking on residents' driveways, as well as parking in Cedar Crescent and Bassnetts Wood. The drivers generally have no consideration for others. It is an accident waiting to happen. • The restrictive yellow lines system implemented along Brookfield Avenue that restricts people from parking at certain times of the day, has not worked. A survey carried out by the Staffordshire County Council 'Clear Streets' organisation is of prime importance. • Congestion is a problem, due to footfall and traffic on the A53 and all side roads. • Traffic generated by the proposed development will make the highways more dangerous than they currently are. On 30th June 2015, Staffordshire County Council refused the development of a roadway access from Stoney Lane, on the basis of increase in highway danger. 					<p>of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>Other site options around Endon lie within the Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc. Note that the Blythe Vale site at Blythe Bridge does not lie within the Green Belt.</p> <p>The submission version Local Plan sets out a residual housing requirement to 2031 for the rural areas as a whole, in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. These requirements do not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too – the Policy factors in assumptions about future infill housing across rural areas which reflects past trends (resulting in a lower residual requirement). This would include sites in/around Endon proposed for development not formally identified on the Endon map.</p> <p>There is not enough brownfield land or sites or infill sites in settlements to meet the District's proposed housing requirements so green field sites have been proposed. Prioritising brown field land over greenfield in all circumstances is not part of Government policy. Any new development taking place will be subject to design policies contained within the new Local Plan.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a</p>	

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					<p>Respondent also states that there will be more reason to refuse the proposed development if access to it is changed to the top house ('Walker's Windows'), because there is likely to be 22/26 houses built.</p> <ul style="list-style-type: none"> The proposed development will increase the number of cars on the road, which will adversely affect air quality. Flooding is a problem in the area, especially for the properties along the A53 and Stoney Lane. Flooding of the stream at the rear of the properties on Brookfield Avenue, down to the culvert on the A53 and along Stoney Lane, has occurred on three separate occasions and resulted in the flooding of St Luke's School playing fields. In relation to the above, rainwater during periods of moderate to heavy rainfall has a detrimental effect on existing stormwater sewers, streams and brooks in the area. This is because the heavy clays, sandstone and peat bogs in Endon have trouble absorbing the rainwater, often leaving it to find its way to the low lying areas, resulting in flooding. A Flood Action Group to which the respondent is a member, is currently considering how to stop the excess surface water from the streams and fields above Brookfield Avenue surcharging onto Brookfield Avenue. This will have a direct effect on any development because the water will need to be diverted into the stream bounding the proposed development, and the rear of properties on Brookfield Avenue. The development will cause additional 'stress' to the streams and low lying land in Endon. 20+ houses is not feasible on this land as expensive flood mitigation measures will be required. The site has a degree of access of existing services and facilities, but existing employment sites are inaccessible from the site. People will have to commute to Leek (an area of few opportunities) and nearby cities for work. Brookfield Avenue is in urgent need of refurbishment. The kerbs and footways are not fit for purpose, the existing drainage system is in need of renewal and 'upsizing', the carriageway needs resurfacing and some services need adapting (such as the main electric feed cable, and gas and water mains to properties). The proposed development would diminish the state of the roads and footpaths even further. <p>The respondent concludes that the quality of where people live will not be improved for the reasons outlined above. The proposed development will not deliver a sustainable, inclusive, healthy and safe community. As such, the respondent suggests the following:</p> <ul style="list-style-type: none"> The site could accommodate three or four large houses to stay in-keeping with the houses along Stoney Lane. This will also allow for the visual open view to be somewhat maintained. 					<p>later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("<i>Trees Woodlands and Hedgerows</i>") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>Policy SS8 defines Endon as a larger village. The larger villages are those which are the most sustainable settlements in the rural areas with some social infrastructure and employment opportunities and good accessibility to towns and larger centres. Policy SS2 focuses the bulk of rural development in these settlements to maintain their role service centres.</p> <p>With regards housing densities, Policy H1(c) expects development to be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area. It is assumed that higher densities will be appropriate in locations which are accessible by public transport.</p>	

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					<ul style="list-style-type: none"> Access could be gained onto Brookfield Avenue 						
LPS35	Housing Allocations	Policy H 2	Mr & Mrs J. A. & C. Hamnett		<p>It is of the respondents' view that the proposal (Policy H2 – DSR1) for the development of land at the corner of Brookfield Avenue/Stoney Lane, Endon (EN128) is sound. They support its inclusion in the Local Plan.</p> <p>The site is located within the built-up area and the existing development boundary of the village of Endon and is the only proposed allocated site in the village. The site is within the built-up area of the village and does not require removal of land from the Green Belt. The site is well located within the village and would be a good site for a range of dwelling types. There are three possible accesses – from both ends of Stoney Lane which is an un-adopted road and via No. 14 Brookfield Avenue onto Brookfield Avenue. The latter property (a semi-detached house) could be demolished, if required, to provide a third access. The Council have recently expanded the site to include Stoneybrook on Brookfield Avenue in case the other access points are not sufficient.</p> <p>The site owners accept that the final access arrangements have to be resolved and that there is opposition to the proposal from local residents, many of which wish to see the site retained as a protected Local Open Space.</p> <p>The decision to include Site EN128 in the Plan is based on sound planning reasons, namely:</p> <ul style="list-style-type: none"> There is a need for housing in Endon including affordable housing. The proposed number of dwellings is 22 of which a third are likely to be affordable houses or starter homes. The site is within the existing settlement and as such its development would be in accord with the existing Core Strategy (2014). No other specific housing sites are identified in the village. The site is not identified as a Local Open Space in the Core Strategy and the Council's Landscape, Local Greenspace and Heritage Impact Study (2016) identified that the site is of low landscape sensitivity; and that it is suitable for development in heritage terms. The Council's Landscape and Settlement Character Assessment (2008) concluded that the site did not satisfy the criteria for Visual Open Space. The Council have not identified the site as suitable for a new Local Open Space. It is contended that the site does not meet the criteria for Local Open Spaces as set out in the National Planning Policy Framework (2012) para 77. Whilst the site is located in the built-up part of the village it does not have particular local significance; it is visually poor, 		Yes	Yes	Yes	Support noted.	No

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					<p>it has no historic significance, it is not used for recreation, it is poor in wildlife terms and is not in the same league as the Green Belt and does not warrant that level of protection.</p> <ul style="list-style-type: none"> The Council's commissioned ecological assessment of potential development sites concluded that the site had fairly low biodiversity value overall apart from a species rich hedgerow and a tree which potentially might contain a bat roost. The report also concluded that the site was poorly connected to the countryside. <p>Local residents have raised other concerns such as traffic, danger to school children, flood risk, nature conservation, scale of development, alternative sites and residential amenity. The Council would have considered these issues and concluded that these issues do not justify not allocating this site for housing in the Submission Version Plan.</p>						
LPS23	Housing Allocations	Policy H 2	Mr Raymond Jones		<ul style="list-style-type: none"> This is a semi-rural area outside of the town development boundary. One of the attractions of this area in Leek is that the boundaries for development are very closely defined. This means that within 10 minutes walk of the town centre you have access to open space, which makes the Mount area very popular for leisure activities such as walking, jogging and cycling. The fields here provide a home for various types of wildlife and this, together with the farm animals that graze them, provide access to nature very close to the heart of Leek. The combination of these two aspects make an early morning walk or a late evening jog across the Mount an uplifting and almost spiritual experience. The views from the Mount over Leek are spectacular and largely unspoilt. Any development of the type proposed would entirely alter the character of the area, as has been the case with the Buxton Road end of Mount Road. If the development were to proceed, over 340 houses would be constructed on pleasant, open countryside. The access along Ashbourne Road and Mount Road would be inadequate with the volume of traffic generated by the development, especially on the junction where Mount Road meets Ashbourne Road given the development that has already taken place on the old quarry site and the proposed development on the other side of Ashbourne Road near Poplar Service Station. Access via the already existing estate off either Knievden Lane and/or Moorland Road would be impossible to sustain, given the narrow nature of the roads in question and the cars parked on both sides of these roads in what is an already busy residential area. The creation of a "rat run" would have serious safety consequences. Furthermore, public transport via the bus service would be inadequate. The proposal for the construction of a new school in the 				<p>The public open spaces / Local Green Spaces proposed by the Council are those mapped in the Submission version Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. The Mount sites LE022/ LE066/ LE128/ LE140/ LE142A/ LE142B were all subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>The Council uses evidence to justify its selection of submission Local Plan sites from wider sites. This includes landscape impact</p>	No	

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					<p>area came as a surprise because most Leek East ward schools are undersubscribed. The volume of traffic that this would create would be chaotic and alter the character of the area.</p> <ul style="list-style-type: none"> • There are other areas of land which would be ideal for development that are brownfield sites within the town centre and the town development boundary. Development of these brownfield sites would not impact on local wildlife and leisure activities, and would be more sustainable as they would not involve significant damage to the environment as a result of increases in traffic in outlying areas. • Given the departure from Leek of major employers such as the Britannia Building Society, a large proportion of these new houses would inevitably be homes for commuters for the Potteries conurbation and/or Macclesfield and Greater Manchester. This would have an adverse effect on the character and community feeling of the area, as well as issues in relation to sustainable investment in local infrastructure. Planning conditions stating that occupiers should have a connection with the local area have repeatedly been shown to be unenforceable in the context of urban development. • Grant of these applications would set a precedent for further alteration of the town development boundary. Then, in no time, the remaining open space at the Mount would be the subject to further applications on the basis that this land would become "infill" development. • There have been applications for planning permission relating to these areas before, most notably in 2007. This was refused on appeal, given the strength of feeling within the local community against this development. • Any attempt to alter the town development boundary to facilitate any or all of these proposals should be resisted as there is no proven case that the type or amount of development proposed is justifiable. • Given the lack of affordable housing in rural locations, more consideration should be given to this type of development, rather than encouraging urban sprawl which would have an adverse effect on the character of the town. 					<p>evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council selects submission Local Plan sites.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022 /LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate). Leek is already served by a number of frequent or less frequent bus routes, connecting to centres such as Hanley, Cheadle, Buxton and Macclesfield. A number of these use main arterial routes such as Buxton Road/Ashbourne/Springfield Road. In some circumstances, major residential developments may be required to contribute to improved bus routes/bus facilities in accordance with Local Plan Pol T1/SM Integrated Transport Strategy.</p> <p>The Council consults with SCC Education during Local Plan preparation, and SCC have indicated a need for additional first and middle- school land provision in Leek resulting from the town's development requirements. These are laid out in the Submission Local Plan. Site ADD01 is identified for the necessary expansion of Churnet View Middle School. Note SCC Education support both the location of the proposed Middle School expansion at Horsecroft; and the location of the new First School on the Mount, in the Local Plan (as the proposed location of the First School adjacent to the high school site offers potential for sharing of facilities e.g. playing fields).</p> <p>The submission Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing</p>	

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										<p>requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.</p> <p>The Moorlands suffers from a shortage of affordable housing; and Local Plan Policy H3 requires that at least 33% of housing on new housing sites be affordable (and a proportion of these be dedicated as starter homes). In addition Policy H1 also sets out the Council's expectations concerning self-build/custom-build housing on new housing sites.</p> <p>Historic planning applications/appeals would have been assessed against Development Plan Policies, and material considerations applicable at that time. The Council is under a legal obligation to assess any planning applications it receives against all applicable Development Plan policies, and relevant material considerations.</p> <p>Need for additional housing stems from a number of factors, for example household formation, in-migration, linkages with future workforce, and other factors. The NPPF makes clear that household projections are the starting point for assessing housing needs; however these additional factors should also be taken in to account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration empty properties in the Moorlands, and the anticipated effects of Brexit. In 2017 the Government announced a public consultation over proposed changes to the way housing need is calculated by Local Authorities.</p> <p>The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible. The Leek requirements are retained from Policy SS3 in the adopted 2014 Core Strategy, which was found sound by Inspector.</p>	
LPS24	Housing Allocations	Policy H 2	Mrs Margaret Jones		<ul style="list-style-type: none"> This is a semi-rural area outside of the town development boundary. One of the attractions of this area in Leek is that the boundaries for development are very closely defined. This means that within 10 minutes walk of the town centre you have access to open space, which makes the Mount area very popular for leisure activities such as walking, jogging and cycling. The fields here provide a home for various types of wildlife and this, together with the farm animals that graze them, provide access to nature very close to the heart of Leek. The combination of these two aspects make an early morning walk or a late evening jog across the Mount an uplifting and almost spiritual experience. The views from the Mount over Leek are spectacular 					<p>The public open spaces / Local Green Spaces proposed by the Council are those mapped in the Submission version Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have</p>	No

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					<p>and largely unspoilt. Any development of the type proposed would entirely alter the character of the area, as has been the case with the Buxton Road end of Mount Road.</p> <ul style="list-style-type: none"> • If the development were to proceed, over 340 houses would be constructed on pleasant, open countryside. • The access along Ashbourne Road and Mount Road would be inadequate with the volume of traffic generated by the development, especially on the junction where Mount Road meets Ashbourne Road given the development that has already taken place on the old quarry site and the proposed development on the other side of Ashbourne Road near Poplar Service Station. Access via the already existing estate off either Kniveden Lane and/or Moorland Road would be impossible to sustain, given the narrow nature of the roads in question and the cars parked on both sides of these roads in what is an already busy residential area. The creation of a "rat run" would have serious safety consequences. Furthermore, public transport via the bus service would be inadequate. • The proposal for the construction of a new school in the area came as a surprise because most Leek East ward schools are undersubscribed. The volume of traffic that this would create would be chaotic and alter the character of the area. • There are other areas of land which would be ideal for development that are brownfield sites within the town centre and the town development boundary. Development of these brownfield sites would not impact on local wildlife and leisure activities, and would be more sustainable as they would not involve significant damage to the environment as a result of increases in traffic in outlying areas. • Given the departure from Leek of major employers such as the Britannia Building Society, a large proportion of these new houses would inevitably be homes for commuters for the Potteries conurbation and/or Macclesfield and Greater Manchester. This would have an adverse effect on the character and community feeling of the area, as well as issues in relation to sustainable investment in local infrastructure. Planning conditions stating that occupiers should have a connection with the local area have repeatedly been shown to be unenforceable in the context of urban development. • Grant of these applications would set a precedent for further alteration of the town development boundary. Then, in no time, the remaining open space at the Mount would be the subject to further applications on the basis that this land would become "infill" development. • There have been applications for planning permission relating to these areas before, most notably in 2007. This was refused on appeal, given the strength of feeling within the local community against this 					<p>regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. The Mount sites LE022/ LE066/ LE128/ LE140/ LE142A/ LE142B were all subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>The Council uses evidence to justify its selection of submission Local Plan sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council selects submission Local Plan sites.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022 /LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate). Leek is already served by a number of frequent or less frequent bus routes, connecting to centres such as Hanley, Cheadle, Buxton and Macclesfield. A number of these use main arterial routes such as Buxton Road/Ashbourne/Springfield Road. In some circumstances, major residential developments may be required to contribute to improved bus routes/bus facilities in accordance with Local Plan Pol T1/SM Integrated Transport Strategy.</p> <p>The Council consults with SCC Education during Local Plan</p>	

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					<p>development.</p> <ul style="list-style-type: none"> Any attempt to alter the town development boundary to facilitate any or all of these proposals should be resisted as there is no proven case that the type or amount of development proposed is justifiable. Given the lack of affordable housing in rural locations, more consideration should be given to this type of development, rather than encouraging urban sprawl which would have an adverse effect on the character of the town. 					<p>preparation, and SCC have indicated a need for additional first and middle- school land provision in Leek resulting from the town's development requirements. These are laid out in the Submission Local Plan. Site ADD01 is identified for the necessary expansion of Churnet View Middle School. Note SCC Education support both the location of the proposed Middle School expansion at Horsecroft; and the location of the new First School on the Mount, in the Local Plan (as the proposed location of the First School adjacent to the high school site offers potential for sharing of facilities e.g. playing fields).</p> <p>The submission Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.</p> <p>The Moorlands suffers from a shortage of affordable housing; and Local Plan Policy H3 requires that at least 33% of housing on new housing sites be affordable (and a proportion of these be dedicated as starter homes). In addition Policy H1 also sets out the Council's expectations concerning self-build/custom-build housing on new housing sites.</p> <p>Historic planning applications/appeals would have been assessed against Development Plan Policies, and material considerations applicable at that time. The Council is under a legal obligation to assess any planning applications it receives against all applicable Development Plan policies, and relevant material considerations.</p> <p>Need for additional housing stems from a number of factors, for example household formation, in-migration, linkages with future workforce, and other factors. The NPPF makes clear that household projections are the starting point for assessing housing needs; however these additional factors should also be taken in to account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration empty properties in the Moorlands, and the anticipated effects of Brexit. In 2017 the Government announced a public consultation over proposed changes to the way housing need is calculated by Local Authorities.</p>	

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										The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible. The Leek requirements are retained from Policy SS3 in the adopted 2014 Core Strategy, which was found sound by Inspector.	
LPS43	Housing Allocations	Policy H 2	Mr A Hewitt		<p>Respondent objects to the development in north east Cheadle.</p> <p>Respondent understands that there is a housing shortage in the UK and that each Council needs to take on responsibility and provide a number of developments in the years to come, but finds it hard to believe that development in the north east of Cheadle is a sensible and viable option.</p> <p>The expansion of Cheadle coupled with the increase in traffic volume over the years has resulted in a fractured traffic system with bottlenecks on Froghall Road (A521) and Town Hall Bank (A522). Traffic on these two roads can be close to a mile long. The majority of Cheadle traffic bypasses the town via a congested one way system (which is already at capacity), as the majority of vehicles contain commuters and shoppers heading towards The Potteries, Uttoxeter and Derby regions, all of which are best served using the A50 (towards the south and west of the town).</p> <p>The majority of new inhabitants to Cheadle have, historically, not given much back to the town centre and services of Cheadle. As the population of Cheadle increases, the shops, services and amenities of the town continue to diminish.</p> <p>The influx of 300 houses is not the reason why the respondent is objecting, but the proposed location in which the 300 houses will be built. As mentioned previously, most Cheadle people shop outside of the town and are served via the A50. It therefore makes sense to develop towards the south and west of the town as Cheadle will not provide jobs for the influx of new residents. Respondent feels the current location was partly considered from a bird's eye view because the gap between the housing development seems a logical place to add houses. However, there are better locations available (e.g. the fields next to the Huntsmen pub or fields between the Master Potter Estate/Brookhouses).</p> <p>Furthermore, respondent would like to know whether the land is considered Green Belt because they often walk through the fields, enjoying the abundance of wildlife in the fields but also in the water course which is vital for local ecology. The fields are also popular public rights of way and wildlife walks. Respondent feels that more brownfield or central locations could be developed instead of losing land that is rich in wildlife. Additionally, recent rainfall has shown that these fields are liable to flooding.</p> <p>Respondent would like the Council to consider the impact that development of this site will have on local people, the</p>					<ul style="list-style-type: none"> The Highway Authority has not raised any issues which would prevent the development of this site. Policy DSC2 states the requirement for a Transport Assessment. The Cheadle Area Strategy recognises that the town has suffered from under-investment in its infrastructure and town centre and a lack of housing opportunities. The spatial strategy identifies the town as an area for significant growth in order to expand its role as a service centre and market town. The Local Plan also seeks to deliver employment opportunities in the Cheadle area. The western section of the site was identified as an appropriate area for housing in the adopted Core Strategy and is within the current development boundary. The site is well related to the existing settlement. The site is greenfield. Policy DSC 1 requires retention of the public footpaths crossing the site. Policy DSC 1 requires surveys and actions recommended by the Extended Phase 1 Habitat Survey and Local Wildlife Assessment. Policy DSC1 requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority. 	No

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					demographics of Cheadle and wildlife. Respondent would be happy to discuss better development options locally.						
LPS44	Housing Allocations	Policy H 2	Ms Kellianne Ross		<p>Respondent would like the southern part of ADD04 removed and the land north of ADD04 (Conway House) included. They would like this land to be developed.</p> <p>ADD04 comprises respondent's land and another land owner's parcel of land. Respondent leaves the following comments:</p> <ul style="list-style-type: none"> In the 'Preferred Options Sites and Boundaries' consultation (April 2016) the owner of the land at Conway House which was identified as a potential development site, stated that if the respondent released their land for development, he would too. The land at Conway House contains a pond and has issues associated with geology, heritage and access. Issues associated with access on the respondent's land and other land owner's parcel of land could be resolved through an access point from Harlech Drive. From a discussion with Belway Homes, respondent states that Belway Homes would be looking to build bungalows on this land. The land has a vehicle access lane/public footpath between the garden at the side of Knypersley Hall and respondent's land, which could be kept as a boundary between Knypersley Hall and their land. With regard to heritage, Knypersley Hall has not been maintained as a historic building as it has been converted into flats over recent years. The parkland setting of Knypersley Hall is more prominent from the southern area of the land, which includes the pond that was originally attached to the respondent's land on ADD04. Releasing Conway House and respondent's land as a whole will have little effect on the Green Belt. Conway House and respondent's land is not at risk of flooding. Development of this land would be a natural extension of the Conway Road estate, and would still leave other Green Belt and open space in place. The objections for the development of respondent's land were based on the school. However, this has now been removed as a better location was identified in the Wharf Road development area. 	Respondent would like the southern part of ADD04 removed and the land north of ADD04 (Conway House) included. They would like bungalows to be built on this land due to the prominence of the land from the road. They also suggest that the land between Knypersley Hall and their land is retained to form a boundary.		No	<p>Land at Conway House is not within the respondent's ownership and the landowner has not made representations supporting the inclusion of his land in the plan at this stage.</p> <p>ADD04 was included in the Preferred Sites and Boundaries Consultation Booklet, published in 2016. It was suggested for inclusion in the consultation responses to the previous consultation in 2015.</p> <p>The two main reasons why it was not included in the Preferred Options Local Plan (2017) are that the site adjacent to Wharf Road (BDNEW) is considered to be preferable due to its more central location and to help bring forward the rest of the Wharf Road site for redevelopment. Also, the potential harm to Knypersley Hall identified in the Council's Historic Impact Assessment. Additionally, the site is of high landscape sensitivity.</p> <p>Knypersley Hall is a Grade II* Listed Building. Recent conversions on the site have made no difference to this status. National planning policy contains strict guidelines requiring the Council to avoid harm to heritage assets unless there are exceptional circumstances. The Council's Heritage Impact Assessment concludes that the whole of ADD04 "could not be developed without substantial heritage impacts."</p> <p>The Council's Green Belt Review assesses the land as part of a wider parcel consisting of the whole area north of Mill Hayes Road. The study considers that the land cannot be readily subdivided because of an absence of clear internal boundaries. Whilst it recommends that the whole area is considered for release from the Green Belt, exceptional circumstances would still need to be demonstrated.</p> <p>Objections from earlier stages covered a whole range of issues – not just a possible new first school.</p>	No	
LPS45	Housing Allocations	Policy H 2	Ms Brenda Ross		<p>Respondent would like the southern part of ADD04 removed and the land north of ADD04 (Conway House) included. They would like this land to be developed.</p> <p>ADD04 comprises respondent's land and another land owner's parcel of land. Respondent leaves the following comments:</p>	Respondent would like the southern part of ADD04 removed and the land north of ADD04 (Conway House) included. They would like bungalows to be built on this land due to the prominence of the land from the road.		No	<p>Land at Conway House is not within the respondent's ownership and the landowner has not made representations supporting the inclusion of his land in the plan at this stage.</p> <p>ADD04 was included in the Preferred Sites and Boundaries Consultation Booklet, published in 2016. It was suggested for inclusion in the consultation responses to the previous</p>	No	

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					<ul style="list-style-type: none"> In the 'Preferred Options Sites and Boundaries' consultation (April 2016) the owner of the land at Conway House which was identified as a potential development site, stated that if the respondent released their land for development, he would too. The land at Conway House contains a pond and has issues associated with geology, heritage and access. Issues associated with access on the respondent's land and other land owner's parcel of land could be resolved through an access point from Harlech Drive. From a discussion with Belway Homes, respondent states that Belway Homes would be looking to build bungalows on this land. The land has a vehicle access lane/public footpath between the garden at the side of Kynerpersley Hall and respondent's land, which could be kept as a boundary between Kynerpersley Hall and their land. With regard to heritage, Kynerpersley Hall has not been maintained as a historic building as it has been converted into flats over recent years. The parkland setting of Kynerpersley Hall is more prominent from the southern area of the land, which includes the pond that was originally attached to the respondent's land on ADD04. Releasing Conway House and respondent's land as a whole will have little effect on the Green Belt. Conway House and respondent's land is not at risk of flooding. Development of this land would be a natural extension of the Conway Road estate, and would still leave other Green Belt and open space in place. The objections for the development of respondent's land were based on the school. However, this has not been removed as a better location was identified in the Wharf Road development area. 	They also suggest that the land between Kynerpersley Hall and their land is retained to form a boundary.			<p>consultation in 2015.</p> <p>The two main reasons why it was not included in the Preferred Options Local Plan (2017) are that the site adjacent to Wharf Road (BDNEW) is considered to be preferable due to its more central location and to help bring forward the rest of the Wharf Road site for redevelopment. Also, the potential harm to Knypersley Hall identified in the Council's Historic Impact Assessment. Additionally, the site is of high landscape sensitivity.</p> <p>Knypersley Hall is a Grade II* Listed Building. Recent conversions on the site have made no difference to this status. National planning policy contains strict guidelines requiring the Council to avoid harm to heritage assets unless there are exceptional circumstances. The Council's Heritage Impact Assessment concludes that the whole of ADD04 "could not be developed without substantial heritage impacts."</p> <p>The Council's Green Belt Review assesses the land as part of a wider parcel consisting of the whole area north of Mill Hayes Road. The study considers that the land cannot be readily subdivided because of an absence of clear internal boundaries. Whilst it recommends that the whole area is considered for release from the Green Belt, exceptional circumstances would still need to be demonstrated.</p> <p>Objections from earlier stages covered a whole range of issues – not just a possible new first school.</p>		
LPS51	Housing Allocations	Policy H 2	Mr Nick Mountford		<p>This response is written on behalf of site owner.</p> <p>The respondent has already responded to Policy SS4 in Comment LPS50 where it is argued that the policy will not be effective in providing housing, particularly affordable housing, in both the larger and smaller villages and the rural areas.</p> <p>The respondent refers to bullet point 2 in Paragraph 50 of the NPPF which states that local planning authorities should "identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand". It is contended that "particular locations" means the particular settlements and villages in the District rather than the broad categories identified in Policy SS4.</p> <p>In the 2015 Site Options public consultation the Council identified a housing target of 85 houses for Endon for the period between</p>		Yes	No	Yes	<p>The Local Plan does not specify housing targets for individual larger villages.</p> <p>The indicative housing requirement for settlements in the Site Options Consultation 2015 was included as a guide based on the information at the time. It was estimated using the following data;</p> <ul style="list-style-type: none"> Core Strategy policy SS3 relating to the spatial distribution of development between the towns and rural areas. Population/facilities of settlements Sites identified in the SHLAA <p>The Local Plan policies and site allocations were refined during the plan making period as more information became available.</p>	No

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					<p>2011-2031. A housing needs survey was also carried out in Endon and Stanley Parish in 2015. The survey concluded that there was an immediate need for 10 affordable houses and likely demand for a further 15 in the next five years. Respondent refers to Appendix 1 of the survey – table showing a timescale for housing requirements.</p> <p>The Submission Plan Policy H3 sets out the requirements for affordable housing where affordable housing should be provided as apart of new development. The Submission Plan only proposes one allocated site in Endon: Stoney Lane where the Council proposes 22 new homes. Based on Policy H3 the Council would seek provision of 7 affordable dwellings on the site which alone is insufficient to meet the immediate need identified in the 2015 housing needs survey for Endon and Stanley Parish. As such, the allocation is unlikely to meet future affordable housing needs.</p> <p>Based on the Council’s 85 gross housing target in the 2015 consultation, the allocated site would not meet the need for general housing in the village (Endon), and windfall and infill sites are unlikely to fill the gap. For example, since the 1st January 2016 planning permission was granted for 12 houses. The respondent wanted to input the number of houses granted permission in 2015 but was unable to get figure at the time of writing their response.</p> <p>Based on the above figures the respondent contends that more sites need to be allocated in Endon for housing to meet local need. Without extra sites this need will not be met. Therefore, the plan is not effective or sound.</p> <p>In 2016 the site owner of Quarry House Farm put forward a site (Ref. ADD008) to be included in the emerging Plan. Although the respondent’s site is in Stockton Brook (a smaller village), Endon is classed as a larger village. Yet Stockton Brook forms part of Endon. The Housing Survey conducted in 2015 was parish-wide and included Stockton Brook as well as Endon. Therefore, the affordable housing need survey figure should be observed as it included the needs of Stockton Brooks as well as the rest of the Parish which includes Endon.</p> <p>Site AD008 should be included in the Submission Plan to enable the local needs (both open market and affordable housing) of both Endon and Stockton Brook and the Endon and Stanley Parish to be met. The Council’s site assessment map indicated that the site could contain 35 houses. Using the latter figure and based on the requirement in Policy H3 in the Submission Plan, approximately 11 or 12 houses of these dwellings would be affordable dwellings, and this would meet most of the likely future affordable housing needs in the Parish.</p> <p>Stockton Brook is unlike many of the other villages listed as smaller villages in the Submission Plan which are described in Policy SS2 as villages which “generally have a poor range of services and facilities and it is often necessary for local residents</p>					<p>The Local Plan does not specify housing targets for individual larger villages.</p> <p>Stockton Brook is defined as a Smaller Village in policy SS9. It is washed over by the green belt. The site ADD08 was put forward as a site suggestion in the responses to the Site Options consultation 2015. It was not taken forward. The Green Belt study considered it was not suitable for release from the green belt.</p> <p>The Local Plan allocates sites for residential development in order to meet the District’s housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not “washed over”). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps. Stockton Brook is washed over by the Green Belt.</p> <p>A criteria based policy approach is proposed for the Smaller</p>	

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					<p><i>to travel outside the village for most of their daily need</i>". Stockton Brook is well placed in terms of communication, including Broadband and services. Whereas many of the smaller villages are isolated and set in open countryside. Stockton Bridge contains more services than most of the small villages. Present services in the village include a general store and supermarket, a doctor's surgery, golf course, public houses, a restaurant, a barber, a beauty shop, and a children's nursery. Power and drainage are already on the site.</p> <p>Stockton Brook lies on the main road (the A53) between Leek and the Potteries where there is a regular and frequent bus route linking the village to the Potteries, Endon and Leek. There are service including a garage and shop to the south-west at Baddeley Green in Stoke less than 400 metres away. Endon Village is also within walking distance from Stockton Brook. The respondent highlights the wide range of education options with primary and secondary schools. The southern edge of Endon is approximately 700 metres away from the cross-road in the centre of Stockton Brook; additionally, the primary and secondary are within approximately 1,350 metres in distance. Endon does not have a specific village centre as services are located throughout the village. The respondent expresses his concerns by referring to the Government's "Manual for Streets" which indicated that a comfortable walking distance for pedestrians is about 800 metres (a 10-minute walk) and distances of less than 2km are considered within walking distance.</p> <p>The respondent believes that Stockton Brook is a part of Endon and that Stockton Brook has been wrongly classified and as such the respondent's site is well situated to meeting the housing needs of Endon and Stanley Parish. The respondent acknowledges that the site is located on the Green Belt and that it does requires exceptional circumstances for a site to be removed from the Green Belt. The respondent argues that his case and reasoning provide exceptional circumstances to meet the local housing needs including affordable housing and the proposed housing strategy would not meet these needs.</p> <p>The respondent's site lies between housing to the north and the road and more housing to the south. The site is a large infill site and is one that would not bring the boundaries of built development any closer to Leek or Stoke than they currently are.</p> <p>To summarise, the respondent has argued that Policy H2 is unsound in terms of effectiveness and that it is not the most appropriate strategy to meet the local housing needs of Endon and Stanley Parish and Endon and Stockton Brook. The respondent has attached an indicative plan showing one possible layout, however this is a low-density scheme and housing number could be increased as necessary. Potentially the site, based on the Council's figure, could provide 35 dwelling including up to 11 or 12 affordable houses but the reliance on the one allocated site in Endon and windfalls and infill development will not meet local housing needs.</p>					<p>Villages rather than infill boundaries as previously suggested or site allocations. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p> <p>Policy H3 sets out how affordable housing will be delivered. In the villages a target of 33% affordable housing should be provided on sites that could accommodate 5 dwellings (0.16 hectares) or more. Rural exception sites for small schemes of 100% affordable housing will be permitted on suitable sites in or on the edge of villages where a need exists in the local area which cannot otherwise be met.</p>	

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LPS68	Housing Allocations	Policy H 2	Mr William Henry Stanley		The land between Portland Drive housing estate and Forsbrook Cemetery, fronting onto Cheadle Road, is not the best quality agricultural land and would be ideal for infilling with affordable housing. The location is complimented by the close proximity of the main drainage sewer in Dilhorne Road, as well as the nearby brook.					<p>The omission site includes two SHLAA sites and a number of adjoining fields. All the land is within the green belt.</p> <p>The SHLAA sites are BB045 a small area to the north of New Close Avenue and BB064 to the north of this.</p> <p>BB064 was classed as a C site in the SHLAA. It was considered unsuitable for development as it would significantly extend Blythe Bridge into open countryside and is not well related to the existing settlement form. It was also considered to have an impact on the landscape setting of the area.</p> <p>BB045 was included in the Site Options consultation 2015 as a potential housing option site. It was not carried forward. The Green Belt review recommended the site was not suitable for release from the Green Belt. The Landscape & Settlement Character Assessment 2008 identified the site as being important to the setting of Blythe Bridge.</p> <p>This omission site is a large site located to the north east of Blythe Bridge all of which is in the green belt. The Landscape & Settlement Character Assessment 2008 identified the site as being important to the setting of Blyth Bridge.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	No

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LPS76	Housing Allocations	Policy H 2		The Winterton Lodge Partnership	<p>The Winterton Lodge Partnership would like to draw the Council's attention to the 65 acre Cotton College site. This is a site that has a Council Development Brief in place (1998), is brownfield and could provide up to circa 80 units of housing.</p> <p>Although the site was not promoted through the SHLAA process, it is available, deliverable and viable.</p> <p>Given the difficulties the Council face in demonstrating a 5 year housing land supply, the site should be considered as an additional allocation under Policy H2.</p>	Cotton College should be considered as a housing allocation for the Rural Areas.	Yes	No	Yes	<p>The Cotton College site is a brownfield site in the countryside located to the north of Oakamoor. Policy SS10 relates to development in the other Rural Areas which is countryside and green belt out the development boundaries and open countryside surrounding the Smaller Villages. It states these areas shall provide development which has an essential need to be located in the countryside and supports the rural areas. It facilitates the appropriate redevelopment of major developed areas where the proposed development brings positive benefits to the area. Policy H1 allows the conversion of buildings to residential use in defined circumstances.</p> <p>The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4.</p>	No
LPS89	Housing Allocations	Policy H 2	Mr Stephen Dobbs		<p>Respondent references Regulation 18 of the Town and County Planning (Local Planning) (England) Regulations 2012, highlighting paragraph (3): "In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)." The respondent contends that the representations made with regard to BDNEW (part of Policy DSB 1) were not taken into account. These representations were not less valid than other representations, yet the Council chose to remove some development proposals located on Green Belt land but not others, namely BDNEW. Evidence of this can be found in an article in the Biddulph Chronicle, which details the meeting during which the Plan was approved and the manner of the discussions of the Council which led to that approval. The respondent feels that the process of the development of the Local Plan has been rigged, treating certain proposals for development in different ways to others.</p> <p>The respondent also makes a number of points with regard to the Statement of Community Involvement. These are as follows:</p> <ul style="list-style-type: none"> With regard to Paragraph 2.5, it was impossible for people objecting to BDNEW to be involved throughout the process because BDNEW was not included as part of the 'Options' stage of the consultation. People could therefore only object to BDNEW as part of the process. With regard to the first bullet point in Table 3.1, Site BDNEW was not covered by two consultations because it was not included within the 'options' stage of the consultation. With regard to the first sentence in Paragraph 3.16, there was no early involvement for BDNEW. It was added at a later stage following people's objections to all Green Belt development in the 'Options' stage of the consultation. With regard to Paragraph 3.23, residents objected to all Green Belt development included within the 'Options' stage of the consultation. Yet the Council added BDNEW at the Preferred Options stage of the consultation. As 	BDNEW could be removed from the Plan and the difference made up by other proposals that were included in the 'Options' stage of the consultation. However, this might be difficult given the strength of feeling about not developing in the Green Belt and the lack of creative alternative proposals which were presented as options. Alternatively, the Council could restart the whole process but make sure that it doesn't breach legislation.			No	<p>The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW (the Green Belt part of the Wharf Road Strategic Development Area - west of the Biddulph Valley Way) was suggested for consideration as part of the Preferred Sites and Boundaries Consultation in 2016. The site was then investigated by the Council to determine whether any constraints existed which made the site unsuitable for inclusion in the Local Plan. For example – Green Belt Review, county highways, land availability, impact on utilities, crossing the Biddulph Valley Way. Once the screening had taken place and it was determined that there were no known factors precluding the inclusion of the site, it was included in the consultation at Preferred Options Stage in 2017. The Council has met the requirements set out in its Statement of Community Involvement – people have had the opportunity to comment on BDNEW at Preferred Options and Submission stages.</p> <p>The Council has carefully considered all responses received from the previous Local Plan consultation to inform the content of this Submission Version Local Plan. In determining which sites should be included in the Local Plan, the Council must balance Government planning policy, relevant evidence <i>and</i> public opinion.</p>	No

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					<p>such, the Council have failed to support community empowerment and have failed to achieve the aspirations under their community strategy.</p> <ul style="list-style-type: none"> With regard to the sentences "Sometimes plans may attract a large number of objections or petitions. These will be taken into account in the same way as other representations" in Paragraph 4.8, the objections and petitions against BDNEW were not taken into account in the same way as other representations. If they had been, the site would have been removed from the Plan like the others were. With regard to the first sentence in Paragraph 4.10, evidence from details of the meeting during which the Plan was approved as reported in the Biddulph Chronicle confirm that the objections and petitions to BDNEW were not considered carefully but were unfairly treated with contempt and disrespect by the Council. 						
LPS93	Housing Allocations	Policy H 2	Mr R Thorneycroft		<p>The agent requests a meeting with the Council to discuss the potential development of their client's site (Eaton House, Buxton Road, Leek, ST13 6EG) and whether it could be allocated through the next stage of the local plan process. The suitability of the client's site as a development opportunity is identified through the Leek Town Centre Masterplan (2014).</p> <p>Background to the site</p> <p>The site is located within the identified settlement boundaries of Leek and in close proximity to the town centre. The site is highly sustainable because it is located in relation to a wide range of key services and public transport options, and comprises a previously developed site.</p> <p>The principal building is known as Eaton House and comprises a two-storey flat-roof office building that was built in the 1980s with brick and render on the external walls. The premises are now considered to be dated given the internal layout and standard of construction (e.g. thermal performance). The accommodation does not compare favourably to other modern office developments within Leek and the wider area. The property will soon be fully vacant and the client is actively seeking prospective office tenants. However, a number of vacant office developments are currently being marketed within close proximity to the client's building (see http://www.rightmove.co.uk/). Adjacent to the client's site, also within the client's ownership, is a detached property known as Roche Villa, which is currently a children's day nursery. These premises are also likely to become vacant during the plan period.</p> <p>The client's site could be used for a number of potential services, given its highly accessible location and proximity to the town centre.</p>				<p>Comments and confirmation of owner position, noted.</p> <p>The submission version Local Plan sets out how the residual housing requirement for the District as a whole will be achieved by a combination of allocations within and around the towns; and within/around rural villages (making allowance for windfall/small sites allowances). Additional housing sites are therefore not required.</p> <p>Subsequent schemes upon this site for the uses suggested (housing /officing /retail) would be assessed on their merits and applying all other relevant Local Plan Policies (including Pol E3) and NPPF Policy.</p> <p>Note that some of the uses referred to in the representation (eg retail, leisure) are additionally affected by town centre protection policies, and may therefore require a sequential demonstration for their creation when not located in a town centre. Note that the site falls <i>outside</i> of the Leek town centre boundary as defined in map A1.3 of the submission version Local Plan.</p> <p>Proposals to develop the children's day nursery would need to be justified against all applicable Local Plan policies including C1 (loss of community facilities).</p>	No	
LPS100	Housing Allocations	Policy H 2	Mr		Respondent questions why the land required for housing	The old Fowlchurch landfill		No		The entire Fowlchurch site is a 'Site of Biological Importance', a	No

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			John Pigott		<p>development needs to be available now, in 2018, when the Plan lasts until 2031.</p> <p>The respondent points out that several brownfield sites within Leek have been considered or are subject to a planning approval. However, there has been no mention of the old Fowlchurch landfill site which was completed at least 15 years ago. This land could be included in the Plan for housing development once methane gas generation has stopped.</p>	site should be included in the Plan.				<p>County-level nature conservation designation. Refer to Policy NE1 Biodiversity and Geological Resources.</p> <p>The Council consults with the Environment Agency during local Plan preparation. The EA raise concerns regarding the potential contamination of the site and advise that in extreme circumstances site may not be developable. County Highways also raise concerns about how this land could be satisfactorily accessed.</p> <p>The National Planning Policy Framework directs Councils to fully meet their objectively assessed needs for housing over a 15 year (or similar) period during plan-making. Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years. However as the Government is seeking to significantly increase the supply of housing the phasing of allocations is generally only justified where there would be problems associated with delivery of housing or infrastructure across a District. Policy SS4 explains how the release of land for housing and employment across the District will be managed in accordance with the expectations of that Policy and delivery monitored regularly. If necessary the Council will review the Local Plan to bring forward additional sites for development.</p>	
LPS101	Housing Allocations	Policy H 2	Mr & Mrs S and S Gibbins	Director Ken Wainman Associates Ltd	<p>This representation is submitted by an agent writing on behalf of the landowners of Site EN030. See Comment LPS102 where it is contended that the policy will not be effective in providing housing, particularly affordable housing, in both the larger and smaller villages and the rural areas.</p> <p>Bullet 2 in Paragraph 50 of the NPPF states that local planning authorities should "identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand". It is contended that "particular locations" means the particular settlements and villages in the District rather than the broad categories identified in Policy SS4.</p> <p>In the 2015 Site Options public consultation the Council identified a housing target of 85 houses for Endon for the period 2011-2031. A housing needs survey was also carried out in Endon and Stanley Parish in 2015. This survey concluded that there was an immediate need for 10 affordable houses and a likely demand for a further 15 in the next five years.</p> <p>Policy H3 sets out the requirements for affordable housing. In Endon there is only one proposed site in the Submission Version Plan (Stoney Lane) where the Council propose 22 houses. Based on Policy H3 the Council would seek provision of 7 affordable dwellings on this site, which alone would be insufficient to meet the immediate need identified in the 2015 Endon and Stanley Parish. Additionally, based on the 85 housing target in the Council's 2015 consultation, the allocated site would not meet the need for general housing in the village. Windfall and infill sites</p>	Remove Site EN030 from the Green Belt and allocate it for housing	Yes	No	Yes	<p>The Local Plan does not specify housing targets for individual larger villages.</p> <p>The indicative housing requirement for settlements in the Site Options Consultation 2015 was included as a guide based on the information at the time. It was estimated using the following data;</p> <ul style="list-style-type: none"> • Core Strategy policy SS3 relating to the spatial distribution of development between the towns and rural areas. • Population/facilities of settlements • Sites identified in the SHLAA <p>The Local Plan policies and site allocations were refined during the plan making period as more information became available.</p> <p>The omission site is within the green belt. It was in the Site Options consultation 2015 but was not taken forward. The Green Belt Study assessed this site and the adjacent one EN125 together it recommended they were not suitable for release from the green belt. It concluded that " these sites play a significant role in maintaining the open character of the village along its northerly aspect"</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3,</p>	No

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					<p>are unlikely to fill the gap.</p> <p>As such, more sites need to be allocated in Endon for housing to meet local need. Endon is a large village with a wide range of services in walking distance for pedestrians. It is appreciated that access to the site submitted in the 2015 Site Options consultation had poor visibility and that the road needed to be widened. In the Preferred Options consultation in 2016, an amended site plan was submitted. The amended site includes the existing house and surrounding buildings as well as the field to the west and north-west. The eastern part of the landowners' site is in Flood Zone 2. However, the Environment Agency flood map shows the existing house and garden to the east is outside of the Flood Zone. The eastern part of the site is in the Flood Zone but it is possible that the land on which these buildings stand could be developed as the landowners own the land upstream, where it might be possible to provide flood attenuation. It would also be possible to design the housing scheme incorporating flood protection. If the Council do not wish the area to the east to form part of the site the reduced site would consist of EN030 plus the house and garden up to the red dash line on the plan.</p> <p>It is accepted that the site and the adjoining site to the west helps maintain the open character of the northern part of the village and that the Green Belt Review does not recommend the release of the two sites from the Green Belt. However, Site EN030 could be developed alone and there would be clear views through into the countryside from the western and eastern sections of the road. In this way development on Site EN030 would appear as part of the countryside and the Green Belt and the village would still retain a countryside aspect. It is also contended that there are exceptional circumstances for Green Belt release in this case, namely the need to meet local housing needs including affordable housing needs.</p> <p>In summary, Policy H2 is unsound in terms of effectiveness and the omission of the site from the policy.</p>					<p>development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt. The Green Belt Study recommended that the site was not suitable for release from the green belt.</p> <p>Policy H3 sets out how affordable housing will be delivered. In the villages a target of 33% affordable housing should be provided on sites that could accommodate 5 dwellings (0.16 hectares) or more. Rural exception sites for small schemes of 100% affordable housing will be permitted on suitable sites in or on the edge of villages where a need exists in the local area which cannot otherwise be met.</p>	
LPS123	Housing Allocations	Policy H 2	Mr T A J Campbell		<p>The policy relating to Moberley Farm is sound, and supported by the landowner. However, the area should be extended to include all or part of SHLAA Site CH093, which should be taken out of the Green Belt for all the reasons given in other submissions made.</p>	<p>SHLAA Site CH093 should be added to the list of parcels included in the Moberley Strategic Development Area with an appropriate increase in the total number of dwellings to be built.</p>	Yes	Yes	Yes	<ul style="list-style-type: none"> Support for Moberley Strategic Development Area noted. CH093 was considered as part of the Green Belt Review Study and the overall impact of development on the purposes of the Green Belt was considered to be moderate. <ul style="list-style-type: none"> Check unrestricted sprawl – contribution Prevent towns merging – limited contribution Safeguarding from encroachment - contribution Setting of towns - contribution The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances and although concludes that it could be considered for release, exceptional circumstances would need to be justified. 	No

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										<ul style="list-style-type: none"> The Landscape, Local Green Space and Heritage Impact Study considers the site to be of high landscape sensitivity. Some screening is provided by woodland to the south, particularly when viewed from the A522, however the land rises up from the woodland and visual prominence increases. The site does not fit well within existing settlement pattern and development of the site would adversely affect the existing settlement pattern and edge, and encroach on countryside. It is considered that there are no exceptional circumstances to justify adding CH093 to the Moberley Strategic Development Area. There are other housing sites available in Cheadle not located in the Green Belt. 	
LPS127	Housing Allocations	Policy H 2	Mrs Susan Dale		<p>The respondent considers the Local Plan unsound due to the inclusion of Site EN128 for development. The respondent presents four arguments around: (1) the loss of open space; (2) safety; (3) infrastructure; and (4) Site EN128's accordance with the NPPF, Core Strategy and Corporate Plan.</p> <p>With regard to the loss of open space (1), the land proposed for development contributes considerably to the open and semi-rural nature of Endon. It should be included within the Plan as Local Green Space for the following reasons:</p> <ul style="list-style-type: none"> It is located within close proximity to the community it serves, in a predominantly residential area where the occupants could reasonably expect a level of amenity concurrent with their property. It has considerable local significance as the site is highly visible from a number of surrounding roads and properties. The site is local in character and not an extensive tract of land. The site contributes significantly to the character of the surrounding settlement by forming an important visual break between high density housing on the A53 and high-density housing to the south and north-west. The site provides an open aspect to the primary school and its playing field, enabling children to enjoy their leisure time without being overlooked. This should be preserved for future generations. The construction of 22 properties in Endon could take place without the development of Site EN128. In the past 10 years, more than 20 houses have been built in gardens. This continuing trend would deliver the required number of houses without intervention, and without resulting in the loss of a valuable local green space. <p>With regard to safety (2), Brookfield Avenue and Stoney Lane become heavily congested at school drop-off and pick-up times.</p>	<p>Site EN128 should be removed from the Local Plan.</p> <p>Respondent states that two years ago, at the start of the consultation process, a need was identified for 200 dwellings on 16 sites in Endon. This apparent need has now reduced to 22 dwellings on 1 site. At a recent meeting, residents were advised by a District Council representative that if EN128 were to be refused then no further development would be proposed in the village. This brings into question the validity of the whole process and the supposed need for 22 dwellings on EN128.</p>	Yes	No	Yes	<p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The submission version Local Plan sets out a residual housing requirement to 2031 for the rural areas as a whole, in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. These requirements do not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too – the Policy factors in assumptions about future infill housing across rural areas which reflects past trends (resulting in a lower residual requirement). This would include sites in/around Endon proposed for</p>	No

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					<p>Some people park on Brookfield Avenue for up to 2 hours whilst waiting for their children, despite the recent imposition of double yellow lines and parking restrictions which are largely ignored. This severely restricts traffic flow and access to properties. The bottom of Clay Lake at the junction of Stoney Lane, and the A53, also become very hazardous at peak times. There is the potential for an additional 40 private vehicles on these roads, as well as visiting vehicles, delivery vehicles and weekly refuse collection vehicles, as a result of the development of EN128. The additional access junction to the site, wherever it is located, would also cause increased congestion.</p> <p>In addition to traffic, visibility is severely compromised by the increased number of pedestrians, both on the pavements and at the school patrol crossings. There is also a blind spot at the top of Brookfield Avenue, which is an accident waiting to happen.</p> <p>The respondent has a copy of a letter dated January 1984 where planning permission was refused on appeal to the Secretary of State for the Environment. One reason for refusal was the effect development would have on traffic flow along Brookfield Avenue. Yet the volume of traffic has substantially increased since 1984. Furthermore, 40 detailed objections were received in the previous stage of the consultation.</p> <p>With regard to infrastructure (3), the local schools in Endon are struggling to meet the existing needs of the school age population. The development of Site EN128 would increase the school age population but the schools would not be able to be accommodate this increase.</p> <p>The inclusion of Site EN128 does not comply with Paragraph 9 of the NPPF (4). Likewise, the Core Strategy requires development to be acceptable in terms of design and amenity. Furthermore, both documents require development to respect its site, its surroundings and promote a positive sense of place and identity through matters such as scale, density, layout, siting, landscaping, character and appearance. The proposed 22 dwellings, presumably of modern design would be out of character with existing developments along Brookfield Avenue and Stoney Lane, and would result in a cramped form of development and lack of spaciousness. The development of Site EN128 would have the opposite effect. Indeed public consultation has already raised concerns over the development in terms of any resultant dwellings being out of keeping with the surrounding area.</p> <p>The respondent also makes reference to the Council's Corporate Plan and its four aims. The proposed development at Site EN128 would not create a safer and healthier environment (Aim 1) and the area would not benefit greatly from the proposal, which could potentially be very costly (Aim 2). The facilities in Endon are oversubscribed and thus the increase in population would not enhance the area (Aim 3). Lastly, the development would not protect or improve the environment (Aim 4).</p>					<p>development not formally identified on the Endon map.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>Previous planning decisions were determined against policy and material considerations applicable at that time. Also note para 32 NPPF which states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development would be severe.</p> <p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>Note that the submission version Local Plan will supersede the Core Strategy.</p> <p>The Council must demonstrate that its Local Plan meets objectively assessed needs for housing and other land uses. The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible, and allows for further growth in larger villages of an appropriate scale (in accord with national green belt policy).</p> <p>With regards housing densities, Policy H1(c) expects development to be at the most appropriate density compatible</p>	

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										<p>with the site and its location, and with the character of the surrounding area. It is assumed that higher densities will be appropriate in locations which are accessible by public transport.</p> <p>The Council has regard to the Corporate Plan during the preparation of the Local Plan. New housing has a proven positive economic benefit to an area, generated both by expenditure of construction industry and through longer term residential spend. The Council's natural environment policies require schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. They also protect trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	
LPS128	Housing Allocations	Policy H 2	Mr Malcolm Dale		<p>The respondent considers the Local Plan unsound due to the inclusion of Site EN128 for development. The respondent presents four arguments around: (1) the loss of open space; (2) safety; (3) infrastructure; and (4) Site EN128's accordance with the NPPF, Core Strategy and Corporate Plan.</p> <p>With regard to the loss of open space (1), the land proposed for development contributes considerably to the open and semi-rural nature of Endon. It should be included within the Plan as Local Green Space for the following reasons:</p> <ul style="list-style-type: none"> It is located within close proximity to the community it serves, in a predominantly residential area where the occupants could reasonably expect a level of amenity concurrent with their property. It has considerable local significance as the site is highly visible from a number of surrounding roads and properties. The site is local in character and not an extensive tract of land. The site contributes significantly to the character of the surrounding settlement by forming an important visual break between high density housing on the A53 and high-density housing to the south and north-west. The site provides an open aspect to the primary school and its playing field, enabling children to enjoy their leisure time without being overlooked. This should be preserved for future generations. The construction of 22 properties in Endon could take place without the development of Site EN128. In the past 10 years, more than 20 houses have been built in gardens. This continuing trend would deliver the required number of houses without intervention, and without resulting in the loss of a valuable local green space. <p>With regard to safety (2), Brookfield Avenue and Stoney Lane</p>	<p>Site EN128 should be removed from the Local Plan.</p> <p>Respondent states that two years ago, at the start of the consultation process, a need was identified for 200 dwellings on 16 sites in Endon. This apparent need has now reduced to 22 dwellings on 1 site. At a recent meeting, residents were advised by a District Council representative that if EN128 were to be refused then no further development would be proposed in the village. This brings into question the validity of the whole process and the supposed need for 22 dwellings on EN128.</p>	Yes	No	Yes	<p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The submission version Local Plan sets out a residual housing requirement to 2031 for the rural areas as a whole, in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. These requirements do not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too – the Policy factors in assumptions about future infill housing across rural areas which reflects past trends (resulting in a lower residual requirement).</p>	No

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					<p>become heavily congested at school drop-off and pick-up times. Some people park on Brookfield Avenue for up to 2 hours whilst waiting for their children, despite the recent imposition of double yellow lines and parking restrictions which are largely ignored. This severely restricts traffic flow and access to properties. The bottom of Clay Lake at the junction of Stoney Lane, and the A53, also become very hazardous at peak times. There is the potential for an additional 40 private vehicles on these roads, as well as visiting vehicles, delivery vehicles and weekly refuse collection vehicles, as a result of the development of EN128. The additional access junction to the site, wherever it is located, would also cause increased congestion.</p> <p>In addition to traffic, visibility is severely compromised by the increased number of pedestrians, both on the pavements and at the school patrol crossings. There is also a blind spot at the top of Brookfield Avenue, which is an accident waiting to happen.</p> <p>The respondent has a copy of a letter dated January 1984 where planning permission was refused on appeal to the Secretary of State for the Environment. One reason for refusal was the effect development would have on traffic flow along Brookfield Avenue. Yet the volume of traffic has substantially increased since 1984. Furthermore, 40 detailed objections were received in the previous stage of the consultation.</p> <p>With regard to infrastructure (3), the local schools in Endon are struggling to meet the existing needs of the school age population. The development of Site EN128 would increase the school age population but the schools would not be able to be accommodate this increase.</p> <p>The inclusion of Site EN128 does not comply with Paragraph 9 of the NPPF (4). Likewise, the Core Strategy requires development to be acceptable in terms of design and amenity. Furthermore, both documents require development to respect its site, its surroundings and promote a positive sense of place and identity through matters such as scale, density, layout, siting, landscaping, character and appearance. The proposed 22 dwellings, presumably of modern design would be out of character with existing developments along Brookfield Avenue and Stoney Lane, and would result in a cramped form of development and lack of spaciousness. The development of Site EN128 would have the opposite effect. Indeed public consultation has already raised concerns over the development in terms of any resultant dwellings being out of keeping with the surrounding area.</p> <p>The respondent also makes reference to the Council's Corporate Plan and its four aims. The proposed development at Site EN128 would not create a safer and healthier environment (Aim 1) and the area would not benefit greatly from the proposal, which could potentially be very costly (Aim 2). The facilities in Endon are oversubscribed and thus the increase in population would not enhance the area (Aim 3). Lastly, the development would not protect or improve the environment (Aim 4).</p>					<p>This would include sites in/around Endon proposed for development not formally identified on the Endon map.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>Previous planning decisions were determined against policy and material considerations applicable at that time. Also note para 32 NPPF which states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development would be severe.</p> <p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>Note that the submission version Local Plan will supersede the Core Strategy.</p> <p>The Council must demonstrate that its Local Plan meets objectively assessed needs for housing and other land uses. The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible, and allows for further growth in larger villages of an appropriate scale (in accord with national green belt policy).</p> <p>With regards housing densities, Policy H1(c) expects</p>	

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										<p>development to be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area. It is assumed that higher densities will be appropriate in locations which are accessible by public transport.</p> <p>The Council has regard to the Corporate Plan during the preparation of the Local Plan. New housing has a proven positive economic benefit to an area, generated both by expenditure of construction industry and through longer term residential spend. The Council's natural environment policies require schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. They also protect trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	
LPS133	Housing Allocations	Policy H 2	St Modwen		St Modwen support the proposal to develop the land identified within Policy DSR1 for mixed use development.					Support noted.	No
LPS150	Housing Allocations	Policy H 2	A Ruddle		<p>Respondent objects to the designation of EN128 as a preferred housing site for the following reasons:</p> <ul style="list-style-type: none"> • The site is unsuitable for this type of development. • EN128 was designated in 1995 as an Area of Visual Open Space. • The site contributes to the open and semi-rural character of the neighbourhood and should be retained on amenity grounds. • Infrastructure is a problem. Brookfield Avenue experiences serious traffic problems during school drop-off and pick-up times. • Safety is a concern during school drop-off and pick-up times. • Even though residents fought to have parking restrictions implemented, Brookfield Avenue is still used to pick-up and drop-off schoolchildren. People have complained, but the scheme is considered low priority. • Development of Site EN128 would add to the problem of safety and parking. • Brookfield Avenue, the A53 and the school playing fields have experienced major flooding issues. This is because the site consists of underlying clays, which water will not percolate through. As such, the groundwater ends up on St Luke's playing field, which results in less sporting activities. The development of Site EN128 would add to this problem. • The development of Site EN128 will result in a loss of wildlife. 				<p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood</p>	No	

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										<p>risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	
LPS166	Housing Allocations	Policy H 2	Mr Yendole	Forward Planning Stafford Borough Council	<p>Stafford Borough Council support the Blythe Vale development proposal as a partner authority within 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.</p> <p>Stafford Borough Council also welcome the opportunity to enter into a Statement of Common Ground with SMDC for submission of the Local Plan.</p>					Support noted. The Council will continue working closely with Stafford Borough Council as part of the Duty to Cooperate.	No
LPS170	Housing Allocations	Policy H 2	Mr D Boulton		<p>Endon with Stanley Parish Council does not consider the allocation EN128 sound. Residents' objections to the development of the site continue to escalate due to a number of reasons.</p> <p>The parcel of land proposed for development contributes considerably to the open and semi-rural nature of the village. Endon is the gateway to the Moorlands and as such, presents the first green and leafy experience when travelling from Stoke-on-Trent. It should be included within the Plan as an open green space for the following reasons:</p> <ul style="list-style-type: none"> It is close to the community it serves and is located in a predominantly residential area where the occupants 		No		<p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement</p>	No	

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					<p>could reasonably expect a level of amenity concurrent with their property.</p> <ul style="list-style-type: none"> • It has considerable local significance as the site is highly visible from a number of surrounding roads. • The site is local in character and not an extensive tract of land. • The site contributes significantly to the character of the surrounding settlement by forming an important visual break between high density housing on the A53 and high-density housing to the south and north-west. • It is the responsibility of the Local Authority to ensure that “a person has the right to a peaceful enjoyment of all their possessions including home and land” (the Human Rights Act, Protocol1, Article 1). As such, private and family life encompasses not only the home, but also the surroundings. The proposed development would adversely affect “the surroundings” of the residents of Stoney Lane. Furthermore, Article 8 of the Human Rights Act states that “a person has a substantive right to respect for their private and family life”. It can therefore be construed that the protection of the countryside falls within the interests of Article 8. • The site has considerable ecological value and provides for the community by preserving the local character of the area and flora and fauna. It has been enjoyed, historically, by everyone. • With regard to local significance, the western boundary of the site lies immediately adjacent to St Lukes’s Primary School, where there is a quiet wildlife area for the children, as well as areas for outdoor study. Furthermore, Stoney Lane is a tranquil place away from the A53, used regularly by both walkers and horse riders. The development of Site EN128 for housing would have a detrimental impact on residential amenity. <p>With regard to access, Stoney Lane is a narrow and unadopted bridleway and Hazelwood Road is fed via Basnetts Wood (part of which is unadopted and treacherous). As such, Brookfield Avenue remains the only access to the site.</p> <p>With regard to traffic, the congestion resulting from pedestrians and cars at school times along Brookfield Avenue cannot be overstated. The Parish Council and residents are convinced that it is a serious accident waiting to happen. For two hours in the morning and two hours in the afternoon, a total of 911 pupils arrive at and depart from Endon High School and St Luke’s Primary. During this time, Brookfield Avenue is used as a car park and drop-off/pick-up point. Pupils who travel to school on foot, often accompanied by parents with prams, remain vulnerable to the amount of cars. Furthermore, despite the presence of double yellow lines, vehicles park on both sides of the road, as well as on the pavement. The residents on Hazelwood Road and Brookfield Avenue cannot enter or exit their properties at school times. Additionally, the dangerous corner at the top of Brookfield</p>					<p>Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The Council has prepared the local plan in accordance with relevant legal obligations and planning guidance. The right to private and family life is one consideration in a wider mix of matters taken into account. The right is a qualified right, meaning, it is sometimes appropriate to interfere with the right if it is in the interest of the wider community or to protect other people’s rights. All consultation responses have been considered and used to inform the planning balance of all the relevant considerations. Respondents whom have submitted representations to the Local Plan can appear at the examination to discuss their concerns if desired.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for ‘local wildlife site’ (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value “<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>” The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 (“Trees Woodlands and Hedgerows”) protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to</p>	

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					<p>Avenue is used as a turning space directly in line with the alternative access to the site.</p> <p>Furthermore, Stoney Lane is a road of restricted width which can only support a single lane of traffic. There is no room to safely pass and there are no passing places. Highway safety would be significantly compromised by the introduction of delivery lorries, refuse lorries and any other vehicles needed to support the new estate. Consequently, the development of Site EN128 would only increase the aforementioned volatile situation.</p> <p>Lastly, flooding is experienced along Brookfield Avenue, Leek Road and in St Luke's School playing fields. Currently Dollisfield acts as a soakaway after heavy downpours. Yet development of Site EN128 would divert this water to an already overwhelmed drainage system. The local Flood Action Group are liaising with the Environment Agency on this matter. Along with this there is a recurrent issue with water flow management in Brookfield Avenue. Rainwater from the adjacent hillside frequently runs down the road like a river, rendering the grids and gullies unable to cope. Flooding is also common on the A53 and in the houses opposite the entrance to Brookfield Avenue.</p>					<p>restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act. Note that Local Plan Policy SD5 on flood risk, expects wherever possible, development to open up any culverted watercourses on site to increase flood water storage and create a green corridor. Also the additional culverting of watercourses will not normally be permitted.</p>	
LPS175	Housing Allocations	Policy H 2	Angela Turner		<p>The development at Site BDNEW should be sensitive to its surroundings, with low rise buildings designated to fit in with the landscape, helping maintain key views of the surrounding hills. The landscaping around the site also needs to deliver SMDC's GI Strategy with regard to the identification of ecological corridors. Additionally, the trees and hedgerows should be retained to link into the wider countryside. A questionnaire given to Neighbourhood Plan residents (greater than 10% return) found that the top answer to the question 'What are the things that you like about living in the Neighbourhood Plan area?' was the rural surroundings (given by 83.8% of people).</p> <p>Site BDNEW could form an important corridor, as well as providing a stunning town walk linking residential areas. People would not, as a result, need to walk along the busy bypass. The installation of a safe crossing from this side of the bypass is still required though.</p> <p>A number of questions were asked about the importance of facilities in Biddulph. The Country Parks and Biddulph Valley Way were deemed as very important by 77.5% and 69.4%, respectively. As such, these need protecting and enhancing. A wide buffer zone either side of the Biddulph Valley Way to also required, to allow it to successfully serve as an ecological corridor.</p>					<p>Policy DSB1, which covers the Wharf Road Strategic Development Area, including BDNEW, requires a masterplan incorporating a landscaping plan including the submission of landscape and visual impact assessments. It also requires the masterplan to incorporate priorities and actions identified in the Council's Green Infrastructure Strategy (which includes enhancing the function of the Biddulph Valley Way as a wildlife corridor). Where possible the existing trees and hedgerows will be retained. A detailed scheme will be worked up as part of the masterplanning process. In any case, there will be further opportunity to comment on the details of the scheme at the planning application stage.</p> <p>The policy requires developer contributions towards improved pedestrian and cycle linkages with the town centre and clearly safe crossing facilities across the bypass would need to be part of this.</p>	No
LPS182	Housing Allocations	Policy H 2	Mr N Weaver, Mrs B D Eastwood, Mr R Weaver and Mr P Weaver		<p>The strategy for Biddulph established by Policy H2 and Policy SS6 focuses on two large mixed-use allocation sites, one which is particularly large, to meet the housing requirement for the Town along with the regeneration of specified brownfield sites. This represents a significant shift in strategy from the emerging Site Allocations DPD, which proposed to release a number of small sites around the edge of the town, including the form Knypersley Garden Centre (Site BD069) for housing. Yet there is no evidence</p>			No		<p>The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now</p>	No

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					<p>or justification for this change in strategy. As such, respondent is concerned that the proposed strategy and emerging Plan is not justified or sound. Moreover, the land to the west of the bypass in the Wharf Road Strategic Development Area requires the release of a large parcel of Green Belt land.</p> <p>588 dwellings are proposed in the Wharf Road Strategic Development Area. This represents 80% of the total proposed residential allocation for Biddulph and 66% of the total proposed provision, when windfall sites are included. Focusing so much of Biddulph's future housing growth in this location is considered unwise and unsound. As such, respondent expresses concern regarding the deliverability of the site. In particular, the understanding that the site may be in multiple ownerships – bringing a range of possible constraints to the development.</p> <p>With regard to Site BDNEW (the large parcel of Green Belt land being released for development), the respondent is concerned whether its release is justified and the most appropriate strategy, when considered against all reasonable alternatives. The Green Belt Assessment for Additional Sites (2017) assessed the site as having a greater contribution to the five purposes of the Green Belt than a number of reasonable alternative sites in the town, including the former Knypersley Garden Centre site. The site is identified as having weak boundaries to the south and west which are not defensible and could fail to prevent further urban sprawl. This would be in conflict with Paragraph 85 of the NPPF. The respondent also notes that the Council's SHLAA (2016) concluded that development to the land west of Biddulph Valley Way would not be suitable because Biddulph Valley Way provides a strong boundary to the settlement and its development would represent an intrusion into the open countryside.</p> <p>The second mixed-use site is the Tunstall Road Strategic Development Area. This site would require the Green Belt boundary to be amended. Yet, as was the case with Wharf Road Strategic Development Area, Tunstall Road Strategic Development Area was assessed as performing a greater contribution to the purposes of Green Belt than the former Knypersley Garden Centre site.</p> <p>The Council also support the regeneration of two mills in the town for housing. However, in order to deliver a total of 57 dwellings, the site would need to be developed at a density of approximately 150 dwellings per hectare which is extremely high, when compared to the character of the town.</p>					<p>planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p> <p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.</p> <p>The Council's Green Belt Review concludes that Knypersley Garden Centre, BDNEW and the strategic site at Tunstall Road are all suitable for consideration for release from the Green Belt (under exceptional circumstances).</p> <p>The issue of urban sprawl is covered by mitigation measures in Policy DSB1.</p> <p>The SHLAA being referred to was published in 2015 alongside the Site Options Local Plan Consultation. This was an early stage in the Local Plan production process and key evidence base documents were yet to be undertaken e.g. the Green Belt Review. Circumstances have changed since these SHLAA records were created.</p> <p>The densities for Biddulph Mills are considered to be realistic. The Council is aiming to minimise levels of Green Belt release.</p>	
LPS183	Housing Allocations	Policy H 2	Mr N Weaver, Mrs B D Eastwood, Mr		Site BD069 (Knypersley Garden Centre) should be removed from the Green Belt and designated as a housing allocation. It does not currently serve or function in relation to the test/purposes for including land within the Green Belt (Paragraph 80 of the NPPF).			No		This site was included as an option in the 2015 'Site Options' consultation and in the 2016 'Preferred Option Sites and Boundaries' consultation. However, following the results of heritage impact evidence and the emergence of an alternative	No

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			R Weaver and Mr P Weaver		<p>The allocation of the site for around 30 dwellings would assist the Council's housing delivery requirements and would be wholly logical and beneficial.</p> <p>In respect to landscape sensitivity, the Landscape Local Green Space and Heritage Impact Study (2016) noted that the former Knypersley Garden Centre site is overgrown and sensitive redevelopment of the site could improve local landscape character through the removal of derelict buildings, the existing metal fencing and scrub.</p> <p>The Assessment noted that the edge of the site was defined and visually very well contained by the existing trees and soft landscaping which are located along its boundaries. The site is summarised as a pocket of brownfield land that is visually isolated. The Assessment further states that that the site is currently bounded by security fencing due to the issues surrounding vandalism and arson. This gives the site an industrial appearance and the development of the site would clearly, therefore provide an opportunity to improve the security of the site for residents living nearby.</p> <p>The land to the south of the site is not in agricultural use and is the Mill Hayes Playing Fields which are used by Biddulph High School. It is considered that the northern boundary of the Playing Fields would provide a more appropriate, clear, and defensible boundary for the Green Belt along a physical feature or use which is readily recognisable and likely to remain permanent in line with paragraph 85 of the NPPF.</p> <p>With reference to the five purposes or functions of Green Belt established in Paragraph 80 of the NPPF, respondent summarises the site's credentials for appropriate removal from the Green Belt:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of built-up areas: The removal of this portion of land from the Green Belt would not encourage or lead to the unrestricted sprawl of any built-up areas. It would see a brownfield site included within the Settlement Boundary, beyond which, by virtue of Mill Hayes Playing Fields is a more suitable and robust delineating boundary to the Settlement. • To prevent neighbouring towns merging into one another: Removing this site from the Green Belt and including it within the Settlement Boundary would in no way lead to the merging of any towns or settlement areas. It would simply see a brownfield element included within the Settlement Boundary beyond which there is a more appropriate start to the Green Belt area, that being the Mill Hayes Playing Fields. • To assist in safeguarding the countryside from encroachment: The inclusion of this brownfield site within the Settlement Boundary would have no impact or encroach further into the countryside, noting that 					<p>more preferable site, this site was removed from the plan in 2017.</p> <p>The Council's Heritage Impact Assessment raises concerns about the impact of new development on this site on neighbouring Knypersley Hall, a Grade II* Listed Building. This is a significant constraint. In relation to the objector's Heritage Impact Assessment by Richard K Morris and Associates, it is considered that this assessment understates the significance of historic features in the site, which comprise the walled garden and rock feature including the grotto, and their contribution to the setting and significance of Knypersley Hall. The original conclusions presented in the 2016 Study that development on the site would highly likely cause substantial adverse effects to the setting remains valid. The intensive redevelopment of the site to accommodate 30 dwellings would significantly weaken the ability to understand the site as a walled garden that was intrinsic to the development of works and ideas by Bateman. However, on the results of a detailed site visit and on consideration of the enhanced mitigation measures put forward by Richard K Morris and Associates, conclusions could be drawn that this harm could be reduced to a lower degree in the range of less than substantial harm, if the number of dwellings was significantly reduced. Notwithstanding this, the finding of less than substantial harm does not equate to a less than substantial planning consideration. Section 66 of the Planning (Listed Building and Conservation Areas) Act (1990) requires the decision maker, when considering applications which affect the significance of a Listed Building, to have "special regard" for the preservation of that listed building or its setting. This is amplified in the NPPF, where "great weight" is required. Following the recent High Court decisions (Barnwell, Forge Field and Mordue), there is a strong presumption against planning permission being granted where harm to a listed building through impacts to its setting is found. It remains that other sites highlighted for allocation within Biddulph were assessed as suitable for development in heritage terms. When compared to this site in heritage terms, they would be less constrained, and have a greater ability to meet housing figures. (Full analysis of the Richard K Morris & Associates report can be found in the evidence document entitled: Landscape, Local Green Space & Heritage Impact Study: Review of Representations May 2018).</p> <p>The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the</p>	

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					<p>the site is already developed. The perceived character and delineation of the countryside would remain as per existing, regardless of the assessment site being removed from the Green Belt.</p> <ul style="list-style-type: none"> To preserve the setting and special character of historic towns: The inclusion of this site within the Green Belt, or otherwise, will have no impact on the setting or special character of the Historic Town. It would merely see a brownfield element of the townscape including the Settlement Boundary, as opposed to it erroneously being included as Green Belt land. See attached Heritage Impact Assessment. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: The site has been previously developed and used. It is not undeveloped countryside land, as is the case regarding elements of the Wharf Road and Tunstall Road Strategic Development Areas. The removal of this site from the Green Belt and subsequent development will assist in urban regeneration, in that this is a brownfield site, and will see the recycling of derelict land which is urban in character given its previous use. Accordingly, it is demonstrated that the removal of this area from the Green Belt would directly assist in reference to this purpose of the Green Belt. <p>The Council's own Green Belt assessment (2016) concluded that the site makes a limited contribution to the five purposes of Green Belt which are set out at paragraph 80 of the NPPF and are summarised above. The Council's assessment also recommended the site be considered for release from the Green Belt and concluded that the site comprises previously developed land with strong defensible boundaries that would provide a logical extension to the settlement.</p> <p>The agent, writing on behalf of their client, specifically requests that the Inspector considers this proposal, providing the following summary to help:</p> <p>Deliverability</p> <p>Footnote 11 of paragraph 47 of the Framework establishes that in order to be deliverable:</p> <ul style="list-style-type: none"> Sites should be available now; Offer a suitable location for development now; and Be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular the development of the site is viable. <p>In reference to the above considerations, the site is indeed available now.</p> <p>The site offers the suitable location for development, given that it</p>					<p>Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p>	

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					<p>represents brownfield land located in close proximity to Biddulph's key strategic and local facilities. Presently, the site adjoins the Settlement Boundary and is located within the Green Belt. The agent's has, however, outlined their client's views that the site's Green Belt location should be considered inappropriate and the site should be included within Biddulph's Settlement Boundary.</p> <p>The site is wholly achievable and has a realistic prospect of being delivered for housing purposes within in a period of less than 5 years. Noting the attractive setting of the site, residential development would be viable and would be attractive to the market and prospective purchasers.</p> <p>Availability</p> <p>The entire site has been in the agent's client's ownership since 2003, however it has been in the client's family's ownership since the 1940's. They have been actively promoting the site for residential development for several years. The site is therefore immediately available for residential redevelopment.</p> <p>There is no legal ownership or other technical impediments to the site's development. Accordingly, it is available now in NPPF terms.</p> <p>The site is approximately one hectare in area. It is anticipated that it could be developed at a density of around 30 dwellings per hectare, which would reflect and respond to the density of nearby residential areas. This results in an indicative site capacity of 30 dwellings. This was reflected in the Council's previous Preferred Options Site Allocation document and SHLAA (2016) which indicated that the Council agreed that the site is capable of delivering within the region of 30 dwellings.</p> <p>Suitability</p> <p>The agent's client has confirmed that varied investigations of the site, supported by appropriate technical consultants as required, have identified no significant technical constraints or issues that might prevent the development of the site for housing or make the development unviable or undeliverable.</p> <p>Given the former use of the site as a Garden Centre it is not anticipated that there would be any issue or constraint to development in terms of ground condition or contamination. It is also understood, that given the full use of the site and its location contiguous with the Settlement Boundary and nearby residential development, the site could easily be linked to mains services. The site is also fairly flat and has no obvious natural constraints.</p> <p>According to the Environment Agency's Flood Map the site is located entirely inside Flood Zone I. This position is confirmed via the Council's Strategic Flood Risk Assessment (2015).</p>						

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					<p>There are a number of trees located on the site, however the majority are located towards the site boundaries. Therefore, it is considered that the majority of the quality existing trees could be effectively incorporated into the design and layout of the site at a later stage.</p> <p>A Heritage Consultant has been appointed to undertake a detailed assessment of the site to assess the potential impact of the residential development of the site on nearby heritage assets. A copy of their report is appended with this letter.</p> <p>The Heritage Impact Assessment, prepared by Richard K Morriss Associates, confirms that the present impact on the setting of Knypersley Hall, its outbuildings and the remains of the walled garden is at best neutral, due to the absence of clear reciprocal views, the incomplete state of the original enclosure of the garden and the derelict condition of the buildings on the site.</p> <p>The assessment concludes that the redevelopment within the walled garden will have a relatively minor visual impact on the setting of the Hall or outbuildings because of the limited reciprocal views and the distances involved.</p> <p>Richard K Morriss Associates has identified clear potential to enhance the perceived historical setting of the Hall and its outbuildings through a considered development of the site. Overall, Richard K Morriss Associates conclude that with good design and well considered layout, the residential development of the site would result in a minor degree of change to the setting of the Hall and its outbuildings but that such change could result in an enhancement of the setting through the renovation of a derelict site and the restoration of much of its basic historical character within the surviving elements of the landscape.</p> <p>Therefore, the previous negative score of the site in the Council's Sustainability Appraisal and in the conclusions of the Landscape Local Green Space and Heritage Impact Study (2016) are inappropriate and should be amended to reflect the conclusions reached by Richard K Morriss Associates. We firmly believe, supported by advice from our Heritage Consultant, that the site should be afforded a much better score than indicated in the Sustainability Appraisal (2017).</p> <p>Achievability</p> <p>There is a clear and realistic prospect of housing being delivered on the site within the next 5 years. The site is available and unconstrained. It could be brought to market rapidly. There have been expressions of interest from potential developers already.</p> <p>There are no significant constraints that might make the development unviable or undeliverable. Therefore, the</p>						

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					<p>development site is viable and can be delivered within the next 5 years.</p> <p>Evidently, for the reasons outlined above this site (Ref BD069) is available, suitable and achievable and is therefore deliverable.</p> <p>Benefits</p> <p>A wide range of benefits would arise from the allocation and subsequent development of the site. These benefits would include:</p> <ul style="list-style-type: none"> • A contribution towards the need for market housing in the town, including a provision of a mix of house types (e.g. small, starter homes and larger family homes) • A contribution towards the need for affordable housing • The provision of a high-quality development • The improvement of a derelict site • Potential enhancements to the setting of heritage assets • The retention of natural and historic features • The creation of open space • The creation of jobs during the construction phase of development • Other financial contributions. <p>The agent on behalf of their client, brings to the Inspector's attention that a total of 16 letters were received in relation to the site during the Preferred Options consultation on the emerging Allocations DPD. Of these, a total of 11 were in support of the sites residential development. Therefore, the redevelopment of the site for housing is also subject to support from members of the local community.</p>						
LPS195	Housing Allocations	Policy H 2	Mrs C Burton		<p>Objects to the development of 22 houses on Dollisfield due to the lack of thought given to safety, which should be central to any plan. Planners, councillors and inspectors have a duty of care to the people they represent. Twice a day Brookfield Avenue is unsafe because of traffic. Developing the land in Site EN128 makes the Plan unsound.</p>			No		<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p>	No
LPS222	Housing Allocations	Policy H 2	Mrs D Brough		<p>The respondent considers the Plan unsound. This is due to the allocation of larger sites over smaller sites. The respondent specifically references the housing allocated to the larger Blythe Vale site without consideration of smaller sites, namely BB027 and BB028 which are considered more appropriate.</p>	<p>SMDC should consider smaller allocations in their Local Plan, specifically Sites BB027 and BB028 which are within 500m of train and bus stops.</p>		No		<p>Sites BB027 and BB028 were previously included the Site Option consultation 2015 but were not taken forward. The sites are within the green belt. The Green Belt Study Review provides a detailed site based assessment of land which could be considered for review and concluded that these sites were not suitable for release from the green belt.</p> <p>The Local Plan allocates sites for residential development in</p>	No

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										<p>order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>The Highway Authority advised that the access road to the site was unadopted and would need to be improved. The Phase 1 Ecological Study highlighted there was a Biodiversity Alert Site (BAS) immediately to the south of the site and recommended the creation of a landscaped buffer between the site and BAS.</p> <p>The Blythe Vale site is not in the green belt and its allocation contributes towards the Local Plan meeting the housing requirement in line with the principles of the Spatial Strategy without removing a significant number of sites from the green belt.</p>	
LPS247	Housing Allocations	Policy H 2	Mr Susan Ruddle		<p>Respondent objects to the designation of EN128 as a preferred housing site for the following reasons:</p> <ul style="list-style-type: none"> • The site is unsuitable for this type of development. • EN128 was designated in 1995 as an Area of Visual Open Space. • The site contributes to the open and semi-rural character of the neighbourhood and should be retained on amenity grounds. • Infrastructure is a problem. Brookfield Avenue experiences serious traffic problems during school drop-off and pick-up times. • Safety is a concern during school drop-off and pick-up 					<p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained</p>	No

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					<p>times.</p> <ul style="list-style-type: none"> • Even though residents fought to have parking restrictions implemented, Brookfield Avenue is still used to pick-up and drop-off schoolchildren. People have complained, but the scheme is considered low priority. • Development of Site EN128 would add to the problem of safety and parking. • Brookfield Avenue, the A53 and the school playing fields have experienced major flooding issues. This is because the site consists of underlying clays, which water will not percolate through. As such, the groundwater ends up on St Luke's playing field, which results in less sporting activities. The development of Site EN128 would add to this problem. • The development of Site EN128 will result in a loss of wildlife. 					<p>within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	
LPS257	Housing Allocations	Policy H 2	Richard Pigott		The respondent objects to the proposed housing allocation off Mount Road as there is no assessment amongst the evidence base documents of the existing amenity value of the Mount. The			No		The public open spaces/Local Green Spaces proposed by the Council are those mapped in the consultation Local Plan. The Council's Local Plan policies seek to improve public access to	No

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					respondent notes the Mount is used more than that of open spaces identified in the Open Space Assessment.					<p>open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. Mount Road is a vehicular highway.</p> <p>New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p>	
LPS258	Housing Allocations	Policy H 2	Mr Dennis Weston		<p>Respondent writes in response to an undated letter addressed to themselves from SMDC (Ref. 212/5/34737).</p> <p>The land adjacent to the house named 'Mayfield' on Stanley Road in Stockton Brook is no longer identified for housing development. However, the land at Stockton Brook is an eyesore and in need of regeneration. Although the land on Stanley Road falls within the Green Belt, so do some of the areas that have been proposed for housing development in the Plan (e.g. around the towns of Leek and Cheadle and the villages of Werrington, Endon, Upper Tean, Alton, Waterhouses and Blythe Bridge). Respondent considers this double standards. As such, the Local Plan is unsound.</p> <p>The area in the south west of Stockton Brook that has high density housing now forms part of Stoke-on-Trent. Can the Inspector therefore introduce the land at Stanley Road into the Plan?</p>		No	No	No	<p>Stockton Brook is defined as a Smaller Village in policy SS9. It is washed over by the green belt. SHLAA site SB016 was included in the Site Options consultation 2015 as a potential housing site but was not taken forward as an proposed housing allocation in the subsequent consultations.</p> <p>Policy SS2 defines the Settlement Hierarchy. The Spatial Strategy of the Local Plan is to focus development in the towns and larger villages and this is reflected in the proposed housing allocations. The Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. No green belt removal is proposed around Leek. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment.</p> <p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>Criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt,</p>	No

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										<p>NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	
LPS260	Housing Allocations	Policy H 2	Mr Nicholas Cartlidge		<p>The inclusion of Site EN128 for development makes the Plan unsound. Brookfield Avenue is heavily congested because it is the main access road for residential properties in Endon and also located in close proximity to Endon High School and St Luke's Primary. As such, an additional junction and additional traffic would manifest the existing problems associated with traffic and congestion in the area. This would be very dangerous because large groups of children often cross Brookfield Avenue and the A53. Additionally, the two schools are barely able to meet existing need in the area. The site could, instead, be used for a school extension in the future.</p> <p>In conclusion, any large scale development of this site would have a detrimental impact not only for the residents of Brookfield Avenue and Stoney Lane, but for the immediate locality.</p>	<p>Respondent draws Council's attention to a parcel of land at the rear of High View Road, Endon. Despite its removal from the original proposal, the developer intended to develop it in the early sixties. Its development would be a natural extension to the existing development. The surrounding properties at this site are more modern and, as such, new housing would be more in-keeping with the character of the area.</p>	Yes	No	Yes	<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>Land rear of High View Rd lies within the Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	No
LPS263	Housing Allocations	Policy H 2	Mr Robert Moseley		<p>The respondent objects to the housing allocation off Wharf Road beyond the disused railway as this land was not included in the original proposed sites, is in the Green Belt and would set a precedent for further development of land on this side of the railway line. Development here would also have an adverse impact on the rural aesthetic of Biddulph. The respondent encourages any development off the bypass to leave as much</p>					<p>The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW (the Green Belt part of the Wharf Road Strategic Development Area - west of the Biddulph Valley Way) was suggested for consideration as part of the Preferred Sites and Boundaries Consultation in 2016. The site was then</p>	No

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					existing vegetation as possible to lessen environmental and visual impact resulting from the development. The respondent suggests the same for development along Dorset Drive.					<p>investigated by the Council to determine whether any constraints existed which made the site unsuitable for inclusion in the Local Plan. For example – Green Belt Review, county highways, land availability, impact on utilities, crossing the Biddulph Valley Way. Once the screening had taken place and it was determined that there were no known factors precluding the inclusion of the site, it was included in the consultation at Preferred Options Stage in 2017.</p> <p>The Council's Green Belt Review concludes that BDNEW could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating specifically to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p> <p>The site policy requires a landscaping plan to include landscape and visual impact assessments to enable appropriate mitigation measures to be incorporated into the final scheme.</p>	
LPS264	Housing Allocations	Policy H 2	Mrs D Cartlidge		<p>The inclusion of Site EN128 for development makes the Plan unsound. Brookfield Avenue already serves the existing residential properties in the area, and is already heavily congested due to the two schools in the area. Any additional traffic would further exacerbate this problem. An additional junction to and from Site EN138 would cause severe congestion along Brookfield Avenue, making the area even more dangerous.</p> <p>Respondent further objects to the development of Site EN128 because the local schools are barely able to meet existing need. The site could, instead, be used for a school extension in the future.</p>	The land at the top of Mayfair Grove should be included for development in the Plan. There is already a site allocated and its development would be a natural extension to the urban environment. The surrounding properties are more modern and, as such, new housing would be more in-keeping with the character of the area. The site has three good access roads, which would improve traffic flow. Furthermore, Endon Hall Primary School has room to expand.	Yes	No	Yes	<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	No
LPS265	Housing Allocations	Policy H 2	Ollerton Estates LLP		This representation was submitted by an agent on behalf of the landowners of LE066 LE128a&b and LE140. The representation is			Yes		Support for inclusion of these sites, and enclosures [including later development statement], noted.	No

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			and Staffordshire County Council (SCC)		<p>in support of the development of these parcels of land. Attached is evidence demonstrating that housing can be delivered at the Mount within the next five years. A Development Statement including Illustrative Masterplan has also been prepared.</p> <p>Leek is a Principal Service Centre and one of the best served settlements in the District with a high proportion of jobs, a large range of facilities and services and good transport links. High quality residential development has the potential to support the continued regeneration of the town.</p> <p>The four parcels of land represent a sustainable location for residential development, outside of the Green Belt. All are within walking distance of bus stops which provide onward travel to Cheadle and Ashbourne, local amenities, shops, health care facilities and services in the town centre. There are also four schools within 1km of the site, and 0.76 hectares of land within LE140 has been safeguarded for educational purposes.</p> <p>The site is not subject to any statutory or non-statutory nature conservation or heritage designations; although a number of mature trees protected by Tree Preservation Orders are located within the site. The site was, however, covered by a non-statutory 'Special Landscape Area' designation as shown in the saved Local Plan (September 1998). Despite this, the designation is time-expired and based on out-of-date evidence.</p> <p>The landowners fully support the identification of these four parcels of land as part of Policy DSL2 and consider that the combined indicative capacity of 267 units will make a significant positive contribution to achieving the overall housing target for the District. It will have the following social, economic and environmental benefits:</p> <p>Social</p> <ul style="list-style-type: none"> • Inclusion of land for a new first school which would meet an identified local need; • Contribution towards the Council's 5-year housing land supply; • Provision of affordable housing for which there is an acute need; • Delivery of a mix of high quality market housing; • New residents may enhance the skills base available to employers in the local area potentially benefit the productivity of local businesses; and • Provision of new housing which will enhance the viability and vitality of the town centre; <p>Economic</p> <ul style="list-style-type: none"> • Creation of direct and indirect employment through the construction phase; 							

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					<ul style="list-style-type: none"> • Generation of significant construction expenditure which will support local construction businesses and those in the supply chain; • Increased local household expenditure which will mainly be focused within the local economy; • Generation of additional Council Tax and New Homes Bonus payments following completion of the development; and • Investment of Capital Receipt received by SCC from the disposal of its landholding back into providing services. <p>Environmental</p> <ul style="list-style-type: none"> • Environmental and landscape management and enhancements where practicable; • Improvements to the local road network in the vicinity of the Sites, including new footways, and; • Additional tree planting where necessary. <p>In conclusion, the four parcels of land are entirely suitable for residential development and there are no technical considerations which would preclude their allocation in the emerging Local Plan. The landowners welcome the opportunity to meet Planning Officers to discuss the development in greater detail.</p>						
LPS266	Housing Allocations	Policy H 2	Mr Paul Dean		<p>The respondent objects to the proposed development on Sites WE003 and WE052 due to their proximity to the prison. The proximity of these sites to the prison renders them unsuitable on grounds of privacy and security. Furthermore, traffic is an issue by these sites. There are better alternative sites available in Werrington, such as in the Washwall Ward at WE042 and WE043. Sites WE042 and WE043 were not added to the Plan because they were considered to form an important landscape. Concerns were also expressed over access. However, respondent is confused by the landscape assessment, and dismayed that access is an issue. Lastly, the respondent is concerned about the Local Plan making process.</p>			No		<p>The site policy DSR 4 states any development of this site would be required to submit a noise impact assessment to consider the effect of the YOI and any mitigation measures. Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 relates to design considerations and seeks to ensure new development protects residential amenity.</p> <p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. These are matters covered by the Government's soundness tests which will be considered at examination by Government Inspector. All stages of the proposed Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p> <p>Resident's views have been sought as part of various public consultations. The Council must balance this evidence against all the other evidence relating to proposed sites and reach a decision on which sites to include as development sites in the Local Plan.</p> <p>Responses to the comments received to previous rounds of consultation have been reported to the Council Assembly and</p>	No

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										are available on the Council's website. The Local Plan does not propose a residential allocation on WE042 and WE043. The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the site at Werrington. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of the sites WE042 and WE043 from the green belt.	
LPS282	Housing Allocations	Policy H 2	Jase Forster		The respondent objects to BDNEW and feels the site was included in the Plan at a later stage on purpose. The Council have ignored the objections received. Furthermore, BDNEW is the only nice untouched piece of countryside out of all the proposed sites in the Plan.					The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW (the Green Belt part of the Wharf Road Strategic Development Area - west of the Biddulph Valley Way) was suggested for consideration as part of the Preferred Sites and Boundaries Consultation in 2016. The site was then investigated by the Council to determine whether any constraints existed which made the site unsuitable for inclusion in the Local Plan. For example – Green Belt Review, county highways, land availability, impact on utilities, crossing the Biddulph Valley Way. Once the screening had taken place and it was determined that there were no known factors precluding the inclusion of the site, it was included in the consultation at Preferred Options Stage in 2017. In determining which sites should be included in the Local Plan, the Council must balance Government planning policy, relevant evidence <i>and</i> public opinion.	No
LPS289	Housing Allocations	Policy H 2	Mr Martin Webb		Agent's client owns the land between Rudyard Road and Hot Lane, Biddulph Moor, which they feel should be included within the Plan. Indeed the site was partially allocated for residential development in the Staffordshire Moorlands Preferred Options Sites and Boundaries consultation. See attachment for description of site. In summary, the site is approximately 2.4 hectares in size, adjacent to the settlement boundary of Biddulph Moor and within the Green Belt. The site was identified as being developable for residential development in the 2015 SHLAA. The only apparent criticism in terms of the suitability of the site is the need to mitigate flooding. Although the site is located in Flood Zone 1, a watercourse runs through the site and there have been reports of highway flooding. However, these drainage issues could be addressed through a drainage scheme, should the site be			No	No	Most of the site is included in SHLAA site BM013, which is classed as a B site. It was included in the Site Options consultation 2015; a reduced area was included in the Preferred Options Sites and Boundaries consultation 2016. It was not carried forward to the Preferred Options consultation 2017. The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy	No

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					<p>developed. The site is considered suitable for an allocation of approximately 70 dwellings, with associated infrastructure and landscaping. However, as a further option, the Council could allocate the part of the site (BM013) which was previously a preferred option in the April 2016 consultation.</p> <p>With regard to the Green Belt Review (November 2015, September 2016 and April 2017), Parcel BM5 Land off Rudyard Road & Parklands falls within the western section of the site. This parcel is identified as having a 'Limited Contribution' to the overall Green Belt.</p> <p>Lastly, this representation is supported by two technical assessments in the attached: Landscape and Ecology Briefing Note by Tyler Grange and Highways Technical Note by SCP. The former assessment concludes that the land between Rudyard Road and Hot Lane is suitable for accommodating development, whilst the latter identifies how development could be sustainably accommodated within the context of existing constraints and landscape mitigation.</p>					<p>H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	
LPS291	Housing Allocations	Policy H 2	Madeline Lovatt	Staffordshire Moorlands District Council	<p>Respondent objects to the soundness of the local Plan in relation to Biddulph for the following reasons:</p> <ul style="list-style-type: none"> • BDNEW should have been included in the 2017 as a separate site. Not showing the BDNEW as a separate site has led to confusion in the consultation and meaningless results. • Other sites have not been given due consideration. • Double standards have been applied to Biddulph sites as residents views have not been considered when compared with other sites such as Akemoor Lane. • Petitions were not taken into account by planners. • Respondent feels that safeguards for any development adjacent to Biddulph valley Way are insufficient. Protections should be clear and site specific. • Residents have also asked respondent to raise two further points: (1) the Local Plan is flawed for Biddulph Moor because it has resulted in no development there; and (2) all the sites should have been considered together, which may have stopped putting one side of Biddulph against the other. 			No		<p>BDNEW is part of the Wharf Road Strategic Development Area. At Preferred Options Stage (in 2017), BDNEW was shown in a different colour to the rest of the area to highlight that it is in the Green Belt and a new addition (at that time).</p> <p>It is not agreed that this meant that the results of the consultation were meaningless. Looking at the figures, it is immediately obvious that the most objections were received in relation to this site compared to others in the 2017 plan.</p> <p>All site suggestions made throughout the consultations relating to Biddulph (and the rest of the District) have been considered by the Council as is shown in the evidence base (e.g. site proformas and other suggested sites tables). Most have been eliminated from the process due to constraints / policy conflicts (e.g. Green Belt Review, Heritage Impact).</p> <p>In determining which sites should be included in the Local Plan, the Council must balance Government planning policy, relevant evidence <i>and</i> public opinion. All petitions received in relation to the Local Plan were reported to the Council Assembly and included in the Consultation Statement so they were part of the decision making process.</p> <p>The site policy, DSB1, requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are taken into account when producing the site masterplan. The Biddulph Valley Way is identified as a 'strategic corridor' in this document.</p> <p>The Local Plan does not allocate any sites for development in Biddulph Moor. However, this does not prevent small windfall sites from being developed. The neighbourhood plan housing requirement table (refer to Policy SS4) includes a net figure for</p>	No

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										<p>Biddulph parish which is higher than that for Biddulph town to allow for some development elsewhere in the Parish.</p> <p>Considering all the sites together whilst undergoing a consultation process would not be possible as some sites, like BDNEW, are suggested as a result of consultation. This approach would not allow that to happen.</p>	
LPS301	Housing Allocations	Policy H 2	Mr Lindon Horleston		<p>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 permissions but is still a significant key factor in the Blythe Vale application and Local Plan. The fact it has outline planning permission makes it even more significant considering other nearby applications and their collective impacts on formulating the Local Plan.</p> <p>The Cresswell application runs contrary to the adopted Core Strategy (e.g. policies E1 and H2) and NPPF on grounds of sustainability due to insufficient infrastructure. Furthermore, the fact that the allocation has been taken up by one developer in one specific area, is against rural policy especially considering the sites flooding and contamination issues.</p> <p>Blythe Vale has not been identified as having the capacity for the growth of a further 300 new houses, and is in direct conflict with the Council's approach to the settlement hierarchy as set out in the Core Strategy. Like the Cresswell application, there is insufficient infrastructure. Respondent also doubts that 10 new jobs will be created by this development.</p>	<p>The Cresswell application should be stopped and expanded on its existing location without the 168 houses, and not in the surrounding greenfield land.</p> <p>Although Blythe Vale is better placed than the Cresswell site with better infrastructure, it should be moderated in its ambition of 300 new houses and industrial units to not impact on Blythe Bridge existing facilities.</p>	No	No	No	<p>The Blythe Business Park application has been through due process and has the benefit of planning consent. The Local Plan takes account of all sites with planning consent in terms of commitments. Outline planning permission SMD/2014/0576 was granted on 24/5/2016 for up to 168 dwellings and up 33,480 square metres of B1, B2 and B8 floorspace & ancillary works to include community centre and shop.</p> <p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>The Local Plan will replace the Core Strategy. It is a review of Core Strategy and it's policies and contains site specific allocations.</p> <p>Policy H2 allocates sites for residential development and includes six sites in the Rural Areas. The Rural Areas is heavily constrained by the green belt. The Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. The Blythe Vale site is not in the green belt its allocation contributes towards the Local Plan meeting the housing requirement in line with the principles of the Spatial Strategy without removing a significant number of sites from the green belt.</p>	No
LPS311	Housing Allocations	Policy H 2	Mr	Willardwillard	With regard to Site CH015, is is still proposed as a potential					National planning guidance states that the Council should assess	No

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			Gez Willard	Ltd	housing site and this ought to remain the case. However, the Council has repeatedly been informed that, due to site clean up costs and site levels, profit margins will be tight. It should be made explicit in the policy that this is the case. The last bullet point under section 1 of the policy should read: "Ensuring development of site CH015 Stoddards Depot, Leek Road pays due respect to its prominent location by appropriate design and layout but not stymying housing development by insisting on contributions to community infrastructure or design standards which are not viable and would prevent development from proceeding."					the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan proposals including the Moberley Farm Strategic Development Area. Support for CH015 is noted. The Council has undertaken viability work which supports the allocation of the site and it is considered to be deliverable. The level of provision of affordable housing will be determined through negotiation taking into account development viability and other contributions.	
LPS323	Housing Allocations	Policy H 2	Mr Gez Willard	Willardwillard Ltd	<p>The following sites should be deleted from this policy:</p> <ul style="list-style-type: none"> Wharf Road Strategic Development Area (BDNEW), Biddulph Moberley Farm (CH085A, CH085B, CH085C, CH085D and CH128), Cheadle <p>The following sites should be added to this policy:</p> <ul style="list-style-type: none"> BD138a&b, Biddulph - see Appendix E in attached CD002 and CD003 - see Appendix C in attached New site proposal in Brown Edge - see Appendix D in attached 					<p>The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the Wharf Road SDA not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation.</p> <p>The Moberley SDA is a key strategic housing site and the majority of the site lies within the town development boundary with a small proportion of the area to the south within Green Belt. There are considered to be exceptional circumstances to release this small section of the Green belt to be able to gain access to this area.</p> <p>BD138a and BD138b are not included in the Local Plan because the Council's Green Belt Review does not recommend the sites for release from the Green Belt due to visual intrusion and the openness of the Green Belt being compromised.</p> <p>The site in Brown Edge is part of a larger area of land which was designated as Visual Open Space (VOS) in the Local Plan 1998 (this designation remained in force in the Core Strategy) and is SHLAA site BE037. This was assessed as a C site. It was not considered to be suitable for residential development due to amenity value of land as visual open space and 'natural and semi natural open space'.</p> <p>It was included in the Site Options consultation 2015 as a potential open space site and in the Preferred Options Sites & Boundaries consultation 2016 as a Public Open Space and Visual Open Space site.</p> <p>The Landscape, Local Green Space and Heritage Impact Study 2016 reassessed the VOS designations to identify which sites were suitable for LGS designation; green infrastructure based designation or were unsuitable for designation as open space. The Study concluded that the part of the VOS site that comprises this omission site was unsuitable for a designation.</p> <p>The Preferred Options consultation 2017 did not take forward the VOS designations instead had a combination of Open Space and LGS designations. In line with the findings of the Landscape, Local Green Space and Heritage Impact Study 2016 the omission</p>	No

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										<p>site did not have any designation.</p> <p>In the Local Plan the site is unallocated land within the development boundary. Policy H1 supports housing development on sites within the development boundaries. Policies SS8 and H1 allow for residential development through windfalls within the development boundaries of larger villages. Any development would need to be in accord with the Spatial Strategy and other Local Plan policies.</p> <p>CD002 and CD003 are within the green belt. They were in the Site Options consultation 2015 and the Preferred Options Sites and Boundaries consultation 2016 but were not taken forward.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>An outline planning application has been submitted on 15/1/2018 for residential development on this site comprising 65 dwellings. The decision is pending. Application number SMDC/2018/0004.</p>	
LPS337	Housing Allocations	Policy H 2	Andy Carter (Homes England)		Homes England welcome the inclusion of site references WE003 and WE052 as part of Policy H2. The sites combined (approximately 1ha and 2.78ha) represent an opportunity to deliver 75 dwellings during the plan period and make a useful contribution to the Council's housing target of 6,080. More importantly the sites offer the opportunity for Werrington &					Support noted.	No

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					<p>Cellarhead to grow in a sustainable manner supporting the local services, and allowing the next generation of residents to find homes in the settlement. Homes England consider that the inclusion of the sites supports the creation of a sound plan for the purposes of delivering homes in a range of locations across the district, and is consistent with the principles of Paragraph 55 of the NPPF which seeks to maintain and enhance the vitality of rural communities.</p> <p>The current use of the land is agriculture within the Green Belt, performing an edge of settlement function in visual and landscape terms. The pattern of development on the southern side of Ash Bank Road is one that is punctuated by green gaps between housing clusters. The inclusion of the two sites allows expansion of the settlement in a sustainable location on land that currently offers limited functionality to the urban fringe. Surrounding land uses include the HM Young Offenders Institute, existing housing, and agricultural land.</p> <p>Both sites have frontages onto Ash Bank Road (A52). Site WE003 has two connection points onto Ash Bank Road and also the opportunity to create a shared route into the site with the current access road to the HM Young Offenders Institute. From a sustainability aspect the local centre of the village is opposite site WE052 and a short walk from site WE003. Werrington Primary School and the local library are to the east of the sites within a ten minute walk, whilst secondary education exists in the form of Moorside High School on the Cellarhead Road.</p> <p>There are no obvious concerns regarding ground conditions. The nature of the site suggests that agriculture was the last known use. An outline planning application would establish if there were any issues with ground conditions through the necessary supporting documents.</p> <p>Assuming the sites are included in the adopted version of the Local Plan Homes England will quickly put together a consultant team to take forward a set of proposals to obtain outline planning consent. During this process Homes England and their advisors will engage with the Planning Officers at the relevant time to undertake pre-application discussions to inform the planning application. Homes England welcome the opportunity to work with the relevant officers at Staffordshire Moorlands District Council.</p>							
LPS345	Housing Allocations	Policy H 2	Mr Martin Webb		Respondent considers that further allocations should be made within rural areas, in particular within the larger villages such as Biddulph Moor. One such site is put forward by the respondent: the land between Rudyard Road and Hot Lane, Biddulph Moor.			No	No	<p>Most of the site is included in SHLAA site BM013, which is classed as a B site. It was included in the Site Options consultation 2015; a reduced area was included in the Preferred Options Sites and Boundaries consultation 2016. It was not carried forward to the Preferred Options consultation 2017.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3,</p>	No	

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										<p>development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	
LPS363	Housing Allocations	Policy H 2	Mr Paul Hill	RPS Planning & Development	The reference to DSC 3 should indicate that 430 dwellings is a minimum figure.	The reference to DSC 3 should indicate that 430 dwellings is a minimum figure.		No		Policy DSC3 allows flexibility by the inclusion of 'approximately 430 dwellings'. A comprehensive master plan for the site will be required to have regard to open space and green infrastructure, mitigation measures such as landscaping and screening, SuDs and buffer strips alongside the river and access roads within the site.	No
LPS371	Housing Allocations	Policy H 2	Mr Mark Stait		<p>Objects to the development of Site EN128 due to a number of reasons.</p> <p>With regard to access, there is currently no defined access that supports the entrance to Site EN128. As such, development will result in disruption as the area cannot sustain traffic numbers. Stoney Lane is a single track road that will not cope with continuous traffic until money is invested. It is an unadopted road so it's unclear who will maintain it. Furthermore, development will have an adverse effect on the landscape.</p> <p>With regard to traffic, Brookfield Avenue experiences significant problems. Many school parents ignore the restriction on parking during school hours, despite traffic enforcement officers being present. They also park on double yellow lines at the bottom of the road, therefore restricting access and causing major congestion and backing up of the A53. Additionally, cars park on both sides of the pavement and on residents' drives. This raises safety concerns for pupils walking to and from school. It is only a matter of time until a child is seriously hurt. When there is no congestion, it is the respondent's experience that the average speed that vehicles drive at is 40+ mph, giving insufficient braking</p>				<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have</p>	No	

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					<p>distance to avoid collision. Adding a further 40 vehicles plus more residents and children walking to and from school, will only exasperate this issue. Respondent also expresses concern over the increase in emissions that will affect residents and school children.</p> <p>With regard to the above, road conditions are deteriorating at the expense of the tax payer. Also, during heavy rainfall, water cascades down the road as the drains cannot sustain the amount of water. This is eroding the road.</p> <p>With regard to the environment, the development of Site EN128 will generate noise, pollution and waste. Furthermore, Site EN128 contains a large variety of old trees, insects, birds and other wildlife such as badgers, newts, owls and bats. Tis must not be lost to development.</p>					<p>regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.</p>	
LPS372	Housing Allocations	Policy H 2	Mr Christopher Howle		<p>Agent is writing on behalf of the landowner of Brook Works, Brook Street, Brook Lees, Biddulph. The representation seeks to demonstrate that the site at Brook Works would constitute a suitable location for the provision of housing. The representation also considers the Plan unsound because the housing proposed is below the Objectively Assessed Housing Need.</p> <p>In order to deliver sufficient housing, it is considered that additional residential sites should be considered in suitable locations. It is also considered that there is a basis to release further Green Belt sites around Biddulph. The land at Brook Works could provide 12 dwellings by partly recycling land which is previously developed, forming a logical and modest extension to the south western portion of the settlement boundary of Biddulph (to serve the Brown Lees area in particular).</p> <p>The Site Options consultation document (July 2015) identified a number of areas considered 'Potentially Suitable Housing Sites' and included a 'Draft New Town Boundary'. As part of these draft proposals, the draft allocation identified the Brooks Works section of the site as forming part of the settlement envelope. The draft allocation also proposed to incorporate an area of land to the north of Brook Street and to the west of Tower Hill Road, which included SHLAA sites BD118 and BD144. The Preferred Options version of the Local Plan that was issued for public</p>			No		<p>BD118, BD109 and BD144 were included in the Site Options Consultation Booklet published in July 2015. The wording in the booklet makes it clear that this list of sites potentially suitable for development formed the basis of public consultation and the inclusion of a site on the list at that stage did not imply the Council's support for that site as an allocation. It also stated that not all of the sites included would be needed and the list would be refined into preferred options following feedback from consultation.</p> <p>None of these sites were included at the next stage (Preferred Sites and boundaries published in 2016) because the Council's Green Belt Review (published in November 2015) did not recommend them for release from the Green Belt due to them being poorly contained physically and visually and making a significant contribution to the Green Belt purpose of preventing encroachment.</p>	No

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					<p>consultation in July 2017 included an updated proposals map which removed the majority of the housing sites that had previously been identified from the Brown Lees area. This included the sites to the north of Brook Street.</p> <p>Planning permission has previously been approved (albeit now lapsed) under SMD/2008/0108 for the brownfield element of the site to be redeveloped to provide 4 dwellings. At present, the land owner is seeking to promote the southern portion of the site in isolation (i.e. land identified solely within Site BD118) as a residential allocation, and recently applied for outline planning permission to develop the large majority of this site to provide 10 dwelling (SMD/2017/0766). However, this was refused on the grounds that development would comprise inappropriate development in the Green Belt. Two other reasons for refusal were design and highways safety.</p> <p>The respondent has attached a Location Plan, Indicative Landscape Proposal, Landscape and Visual Impact Assessment and Technical Transport Note as part of their representation.</p>						
LPS379	Housing Allocations	Policy H 2	Ms Carolyn Walker		<p>Respondent does not believe that due diligence has been followed in respect of the consultation on the viability of the Blythe Vale site. The viability and sustainability of the Blythe Vale site has only been assessed in isolation and not as a whole within the SMDC Preferred Options appraisal. As such, it has not undergone the public scrutiny afforded to other sites included within the Plan.</p> <p>The Blythe Vale site has only recently been included in the Plan. In the past, there has been no mention of the site as a proposed housing development site and no attention has been drawn to it on either map in the 2012 SHLAA, the Site Objections consultation 2015, the draft Blythe Bridge & Forsbrook Options Site Assessment Map 2016 and the final Blythe Bridge & Forsbrook Options Site Assessment Map 2016. The Blythe Vale site has, throughout all negotiations and proposals from 2012 onwards, been shown as an Employment and Preferred Employment site. This contradicts Policy SS8 of the Core Strategy.</p> <p>Additionally, the Blythe Vale proposal is not the most appropriate strategy for the delivery of circa 60% of the housing allocation required for the larger villages. Furthermore, it is not the most appropriate strategy when considering this site alongside the alternative sites in the Blythe Bridge & Forsbrook area (see draft Blythe Bridge & Forsbrook Options Site Assessment Map 2016).</p> <p>The Environment Agency has also expressed concern over noise and wildlife. One solution to this appears to be the development of an acoustic wall. St Modwen's approach was to build the affordable housing backing onto the A50 bypass as a buffer. There has also been a request for further ground investigations regarding contamination of land.</p>	In accordance with the NPPF, the Council should take into consideration the need to promote sustainable patterns of development. Thus smaller, well located sites close to towns and village boundaries should be considered for development.	No	No	<p>The Sustainability Appraisal Report and Viability Study have considered the site.</p> <p>The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process taking into account information from the evidence base, government policy and responses to the consultations. The Blythe Vale site was included in the Preferred Options consultation 2017.</p> <p>The Spatial Strategy in the Local Plan is in accord with government policy and the Core Strategy. The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in the policy. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential</p>	No	

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										<p>development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment.</p> <p>The Environment Agency have raised no concerns regarding this site. Local Plan policies SD4,DC1,NE1 & DSR1 relate to pollution & water quality, noise and biodiversity.</p>	
LPS392	Housing Allocations	Policy H 2	Seabridge Developments Limited		<p>This representation is submitted by an agent on behalf of Seabridge Developments Limited who object to the policy. They object to this policy because the land to the west of Biddulph Valley Way (DSB1) was a very late inclusion to the Plan. It was not considered at the Preferred Site Options (2016) stage of the consultation, and not mentioned in the description of the Strategic Development Area in the Preferred Options document. Seabridge Developments Limited also raise the following issues with Site BDNEW:</p> <ul style="list-style-type: none"> Land to the west of Biddulph Valley Way is inappropriate, not least because of its value to the purposes and objectives of Green Belt. The construction of a main estate road access across Biddulph Valley Way will have a significant adverse impact upon the landscape. This site has not been properly assessed, and is unnecessary in light of better alternatives. The amount of commercial (employment and retail) provision in the northern part of the site has been unacceptably reduced and should be increased again to reflect the provision indicated in the 2016 consultation. The capacity of the remaining land to accommodate housing has been overstated, having regard to the significant constraints that exist and which have yet to be fully evaluated, including ecology, former mine workings, flood risk, important visual open space, steeply sloping topography, spring, the importance and setting of the Biddulph Valley Way ownerships and title constraints. <p>Seabridge Developments Limited suggest that BDNEW is removed from the Plan and that, in any event, the figure of 588 dwellings for DSB1 should be reduced.</p>			No	No	<p>The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation in 2016. The site was then investigated by the Council to determine whether any constraints existed which made the site unsuitable for inclusion in the Local Plan. For example – Green Belt Review, county highways, land availability, impact on utilities, crossing the Biddulph Valley Way. Once the screening had taken place and it was determined that there were no known factors precluding the inclusion of the site, it was included in the consultation at Preferred Options Stage in 2017.</p> <p>The Council's Green Belt Review concludes that the site could be considered for release from the green belt if exceptional circumstances can be demonstrated.</p> <p>It is not agreed that the Biddulph Valley Way would be significantly compromised by another vehicular crossing. Several already exist further north (at Halls Road, Mow Lane, Marshgreen Road) so this proposal does not set a precedent.</p> <p>The amount of employment and retail ('commercial') provision at Wharf Road has reduced from 3.5ha in 2016 to 1.5ha in the Submission Version Plan. This is because in 2016 the commercial figures given in the consultation document allowed for a surplus of employment land. When preparing the 2017 Preferred Options Local Plan the commercial hectareage figures were reduced at Wharf Road and Tunstall Road. In the case of Wharf Road it was considered that using this non-Green Belt land for housing would be more appropriate in order to minimise Green Belt development.</p> <p>The supporting text to Policy DSB1 in the Submission Version Local Plan (paragraph 9.35) explains that the density levels vary across the site with the highest level assumed for the area between the bypass and Tunstall Road and lower levels for the most constrained parts of the site. It is not considered that the density levels are excessively high – land to the west of the bypass has been assumed to have either 29dph or 35dph density. When calculating density levels on this site the Council needs to consider making best use of the land to minimise incursions into the Green Belt.</p>	No

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LPS412	Housing Allocations	Policy H 2	Wainhomes (North West) Limited		Whilst 461 rural dwellings are allocated within Policy H2, housing is overly apportioned to Blythe Vale to deliver 300 of these dwellings over the plan period. It is considered that 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 respondent's site at Wardle Gardens should be allocated within Policy H2, in order to help meet the district and affordable housing needs.			No	No	The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The Blythe Vale site is within Staffordshire Moorlands District and will contribute to meeting the housing requirement for the Rural Areas.	No
LPS421	Housing Allocations	Policy H 2	Mrs E Loxley		Respondent objects to proposed sites LE128, LE140, LE66 and LE142a&b. The respondent notes the developments will increase traffic congestion and remove a valued recreational area. There is no employment growth within the area and therefore any development will only accommodate people employed in Manchester and Stoke. The will increase traffic numbers. The respondent also notes that the supermarkets are not located on this side of Leek, and thus people will have to drive to visit them.			No		<p>The public open spaces/Local Green Spaces proposed by the Council are those mapped in the consultation Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces.</p> <p>New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022/LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate).</p>	No
LPS423	Housing Allocations	Policy H 2	A Frain		Respondent objects to development EN128 on the grounds of insufficient access, transport infrastructure and drainage.					<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable</p>	No

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										drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.	
LPS432	Housing Allocations	Policy H 2	Mr Bridge		The respondent expresses concern regarding Site EN128. The development site is considered unsound as the site is subject to access restrictions. The respondent states the land should be green open space for wildlife habitats. The respondent also expresses concern that the development will have detrimental effect on traffic congestion and road safety in surrounding roads, including increased risk to local schoolchildren.			No		<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	No
LPS433	Housing Allocations	Policy H 2	Mrs C Jackson		The respondent expresses concern regarding Site EN128, including potential for adverse effects of traffic congestion and increased flood risk around Brookfield Avenue and the A53.					The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this	No

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										<p>will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p>	
LPS534	Housing Allocations	Policy H 2	Mr R Goodall		The respondent considers the Plan unsound. This is due to the allocation of larger sites over smaller sites. The respondent specifically references the housing allocated to the larger Blythe Vale site without consideration of smaller sites, namely BB027 and BB028 which are considered more appropriate.	SMDC should consider smaller allocations in their Local Plan, specifically Sites BB027 and BB028 which are within 500m of train and bus stops.		No		<p>Sites BB027 and BB028 were previously included the Site Option consultation 2015 but were not taken forward. The sites are within the green belt. The Green Belt Study Review provides a detailed site based assessment of land which could be considered for review and concluded that these sites were not suitable for release from the green belt.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>The Highway Authority advised that the access road to the site was unadopted and would need to be improved. The Phase 1 Ecological Study highlighted there was a Biodiversity Alert Site</p>	No

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										(BAS) immediately to the south of the site and recommended the creation of a landscaped buffer between the site and BAS. The Blythe Vale site is not in the green belt and its allocation contributes towards the Local Plan meeting the housing requirement in line with the principles of the Spatial Strategy without removing a significant number of sites from the green belt.	
LPS560	Housing Allocations	Policy H 2	Mr Gez Willard	Willardwillard Ltd	Respondent does not support the development of Mobberley Farm because Cheadle does not have sufficient road and infrastructure to meet the additional traffic that the development would bring. Respondent suggests that reference to this site is removed from the policy.					<ul style="list-style-type: none"> The Cheadle Town Centre Phase 2 Study (2017) identifies the likely impacts of the housing and employment Preferred Options sites on the surrounding highway network. By 2031 the study predicts queuing and delays in certain locations, in part due to 17 years of potential traffic growth which is compounded by the additional trips generated by new housing and employment. There is limited scope to change junction characteristics to improve network capacity within the Town Centre due to its historically confined road structure. The study recommends a package of mitigation measures in order to provide additional capacity onto the overall network. Mitigation measures include junction and lane improvements, new sites having good access to public transport provision, measures to encourage walking and cycling to reduce short trips, improved HGV signage and new parking bays along High Street. National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan proposals. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan. The Mobberley Strategic Development Area is a key housing site in the Local Plan and is considered to be deliverable and viable. 	No
LPS457	Housing Allocations	Policy H 2	Ms Dorothy May Levano		The respondent feels the development of Site EN128 will exacerbate traffic problems on Stoney Lane in Endon. Traffic is already a serious issue in the area yet people ignore the notices.					The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.	No
LPS558	Housing Allocations	Policy H 2	Mrs Maureen		Respondent expresses concerns regarding the development of Site EN128.			No		The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early	No

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			Cotton		<p>The development of 22 houses on Site EN128 would add pressure to the brook, contributing towards flooding. Yet there would be nowhere for the water to drain. Due to the nature of the land in Endon, a Flood Action Group was formed to highlight local concerns. Site EN128 acts as a natural soakaway yet this will be replaced by hardstanding if the development is permitted.</p> <p>Building on a Visual Open Space will not enhance a neighbourhood. Development will bring noise and light pollution, as well as exhaust fumes in close proximity to people's properties and the school. Dollisfield (Site EN128) provides an environmental balance between the busy avenues in the area, the schools, and the oversubscribed A53. Development of Site EN128 will turn the village into urban sprawl.</p> <p>There is a gate at the top of Brookfield Avenue that leads to Barstows field, then Edge Lane, Tinsters Wood, Brown Edge and Biddulph Moor. It is served by a right of way and the countryside around the village of Endon is well used and enjoyed by walkers, dog walkers and school children.</p>					<p>engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act. Note that Local Plan Policy SD5 on flood risk, expects wherever possible, development to open up any culverted watercourses on site to increase flood water storage and create a green corridor. Also the additional culverting of watercourses will not normally be permitted.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>Development proposals affecting the routes of recognised public rights of way would need to make allowance for them.</p> <p>Issues such as external lighting in schemes can be controlled by</p>	

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										the Council's amenity policies. Streetlighting is a matter controlled by SCC Highways. Note that external lighting (where not separately controlled by planning conditions) should be considered under statutory nuisance legislation.	
LPS503	Housing Allocations	Policy H 2	Mrs. Judith Clarke		Respondent objects to housing allocation EN128 on the grounds of poor access, increased traffic congestion and reduced road safety to schoolchildren. The respondent also suggests the number of properties is out of keeping with surrounding properties.					<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p>	No
LPS516	Housing Allocations	Policy H 2	Mrs Barbara Forster		<p>Respondent objects to allocation BDNEW. Respondent feels the site's late inclusion was inappropriate. Secondly, other sites have not been properly considered. Thirdly, objections have not been taken into account when compared to other sites, including Akemoor Lane and Newpool Road. Fourthly, a number of petitions opposing the development were not taken into account by the Council. Lastly, respondent does not believe that the safeguards for any development next to Biddulph Valley Way are sufficient.</p> <p>The respondent raises two further points, on behalf of the residents: (1) the Plan is flawed for Biddulph Moor because it has not resulted in any development there; and (2) all the sites should have been considered together. This might have stopped putting one side of Biddulph against the other.</p>			No	<p>BDNEW is part of the Wharf Road Strategic Development Area. At Preferred Options Stage (in 2017), BDNEW was shown in a different colour to the rest of the area to highlight that it is in the Green Belt and a new addition (at that time).</p> <p>BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation in 2016. The site was then investigated by the Council to determine whether any constraints existed which made the site unsuitable for inclusion in the Local Plan. For example – Green Belt Review, county highways, land availability, impact on utilities, crossing the Biddulph Valley Way. Once the screening had taken place and it was determined that there were no known factors precluding the inclusion of the site, it was included in the consultation at Preferred Options Stage in 2017.</p> <p>It is not agreed that the results of the consultation were meaningless. Looking at the figures, it is immediately obvious that the most objections were received in relation to this site compared to others in the 2017 plan.</p> <p>All site suggestions made throughout the consultations relating to Biddulph (and the rest of the District) have been considered by the Council as is shown in the evidence base (e.g. site proformas and other suggested sites tables). Most have been eliminated from the process due to constraints / policy conflicts (e.g. Green Belt Review, Heritage Impact).</p> <p>Three public consultations on sites were held (in 2015, 2016 and</p>	No	

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										<p>2017).</p> <p>In determining which sites should be included in the Local Plan, the Council must balance Government planning policy, relevant evidence <i>and</i> public opinion. All petitions received in relation to the Local Plan were reported to the Council Assembly and included in the Consultation Statement so they were part of the decision making process.</p> <p>The site policy, DSB1, requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are taken into account when producing the site masterplan. The Biddulph Valley Way is identified as a 'strategic corridor' in this document.</p> <p>The Local Plan does not allocate any sites for development in Biddulph Moor. However, this does not prevent small windfall sites from being developed. The neighbourhood plan housing requirement table (refer to Policy SS4) includes a net figure for Biddulph parish which is higher than that for Biddulph town to allow for some development elsewhere in the Parish.</p> <p>Considering all the sites together whilst undergoing a consultation process would not be possible as some sites, like BDNEW, are suggested as a result of consultation. This approach would not allow that to happen.</p> <p>The Highway Authority has not objected to development in Biddulph. As with all new development of this scale a Transport Assessment will be required.</p>	
LPS487	Housing Allocations	Policy H 2	Mr Grant Anderson	Fradley Estates	<p>Fradley Estates (FE) objects to the allocation of 300 dwellings at Blythe Bridge for the following reasons:</p> <ul style="list-style-type: none"> The land allocated in DSR1 has previously been identified as a regional investment/strategic employment site. The strategy to allocate this land appears solely driven by the desire to avoid any further Green Belt releases. Such an approach is inconsistent with the vision of the Local Plan, to achieve "sustainable and balanced urban and rural communities". Policy SS2 states that there is a significant range of large villages in terms of their size and facilities and that "the scale of development in each area should be relative to their current size and infrastructure capacity". Werrington is the second largest of the 12 villages identified, and one of three villages (along with Cheddleton and Blythe) which are significantly larger than the remaining nine villages. As such, development for the Rural Areas should be allocated in Werrington, Cheddleton and Blythe Bridge. In comparison with Blythe Bridge for which DSR1 allocates 300 houses, only 75 dwellings are proposed in Werrington. Development is unduly skewed to Blythe Bridge with the consequence that Werrington will be 	The Local Plan should be modified by the deletion/reduction in numbers for DSR1 and the provision of additional housing for the settlement of Werrington by the allocation of FE's site at Langton Court/Tregaron Court (WE042 and WE043).		No		<p>Policy H2 allocates sites for residential development and includes six sites in the Rural Areas. The Rural Areas is heavily constrained by the green belt. The Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. The Blythe Vale site is not in the green belt its allocation contributes towards the Local Plan meeting the housing requirement in line with the principles of the Spatial Strategy without removing a significant number of sites from the green belt.</p>	No

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					<p>underprovided in terms of meeting its fair and proportionate future housing needs. This approach is inconsistent with the objectives of the Plan.</p> <ul style="list-style-type: none"> Given the size and facilities of Werrington, the village is capable of accommodating a much greater share of the rural housing distribution. With regard to the above point, FE's site at Langton Court/Tregaron Court (WE042 and WE043) should be allocated for housing. 						
LPS493	Housing Allocations	Policy H 2	Mr Grant Anderson	Fradley Estates	<p>Fradley Estates (FE) object to Policy H2 on the grounds it is unsound, with regard to Sites WE003 and WE052 (DSR4). The allocation of these sites is not effective as they are not deliverable. In particular, the attached technical note prepared by SCP identifies a number of highway constraints associated with both WE003 and WE052.</p> <p>In the case of WE003, SCP do not consider that the necessary vision splays of 120 metres for the 'y' distance can be achieved. This means that a safe access in accordance with current highway design standards cannot be delivered.</p> <p>In the case of WE052, the site frontage is currently occupied by a bus stop, which would need to be relocated. However, SCP do not consider there to be scope to relocate this bus stop in the locality. Furthermore, SCP consider that there are serious doubts whether a safe access can be achieved to WE052 due to constraints on visibility. The Highways Authority have also identified the same type of issues (see attached).</p> <p>Furthermore, the location of WE003 and WE052 means that families and children in any new dwellings on these sites will need to cross the busy Ash Bank Road, to access facilities. Yet there is no pedestrian crossing. Both sites should therefore be considered unsatisfactory from a highway safety perspective.</p> <p>FE do not consider the allocation of WE003 and WE052 as justified, with regard to reasonable alternatives. In this respect, it is submitted that FE's site off Langton Court and Tregaron Court (WE042 and WE043) is a deliverable housing site that is materially better than WE003 and WE052. The FE site does not have serious highway constraints which would affect its deliverability. Furthermore, SCP have advised that a satisfactory access to the FE Site can be achieved which meets the current highway design standards. Being located to the north of Ash Bank Road, the FE Site also does not have the same highway safety concerns as sites WE003 and WE052 in relation to safe access to community facilities. FE have attached a report by Louis Taylor (see attached) that demonstrates that the FE Site is better than WE003 and WE052.</p> <p>Residents living near the HMYOI already complain of noise and bad language from the HMYOI. As such, the building of housing closer to and immediately adjacent to the HMYOI will not only</p>	WE003 and WE052 (Policy H2 and Policy DS4) should be replaced with the FE Site off Langton Court/Tregaron Court.		No		<p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas including the land off Ash Bank Road in Werrington which is in the green belt. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances justify the release of the site off Langton Court/Tregaron Court from the green belt.</p> <p>The Local Plan includes a residential allocation in Werrington in the green belt. It is considered there are exceptional circumstances regarding this site which justify its release from the green belt to contribute to meeting the District's housing requirement.</p> <p>Werrington is a defined as a larger village in the policy SS2 Settlement Hierarchy. The Green Belt Study considered the residential allocation in Werrington is suitable for release from the green belt if there are exceptional circumstances.</p> <p>The Green Belt is tightly drawn around Werrington and there is limited capacity in the settlement for further growth. The</p>	No

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					<p>create a poor residential environment but inevitably lead to conflicts between housing and the HMYOI. In contrast, the FE Site does not have any of these issues and given its site characteristics, it is considered that it will create a high quality residential environment.</p> <p>The allocation of WE003 and WE052 is inconsistent with national policy – in particular Paragraph 123 of the NPPF and Policy SD4 of the Local Plan. Both these policies seek to protect people and the environment from pollution (including air/water/noise/vibration/light/ground contamination).</p> <p>FE have attached an extract of the Council's consultants' assessment of the FE Site off Langton Court/Tregaron Court, an assessment by Bright & Associates on both the FE Sites and Sites WE003 and WE052, an extended Phase 1 Habitat Survey by Haslam Ecology, and a summary of the comparison between WE003 and WE052.</p>					settlement has a number of facilities and services and is considered to be a sustainable location to support some growth. The allocated site in Werrington is owned by the Ministry of Justice and is due to be transferred to Homes England via an approved land transfer programme. Homes England are proposing to carry out work to ensure the delivery of the housing through an appropriate developer. (See LPS337).	
LPS451	Housing Allocations	Policy H 2	Mr A Dean		<p>Respondent is opposed to the development of Site EN128 because it is not, in any way, suitable or beneficial for the local area.</p> <p>Unlike other avenues and roads, Brookfield Avenue experiences major problems and dangers associated with traffic. This is especially the case at peak periods during school days. Cars entering or leaving the avenue are faced with over parking and a sharp blind bend into Hazelwood Road and Stoney Lane, making it dangerous for pedestrians as well as drivers. The respondent has seen cars and vans mount the pavement here, so as to avoid accident. The development of Site EN1238 will only add to these problems.</p> <p>Site EN128 is a vital part of the rural aspect of Endon and should remain so. A very large proportion of residents are opposed to this development.</p>				<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p>	No	
LPS528	Housing Allocations	Policy H 2	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	<p>Policy H2 proposes the allocation of 300 dwellings for land at Blythe Vale, Blythe Bridge. Policy H2 also allocates sites at Werrington (Policy DSR4) which are proposed to be released from the Green Belt on the basis that:</p> <ul style="list-style-type: none"> The site would meet the residual requirement for the Rural Areas. The suitability and status of the proposed site as public sector land. The lack of opportunities for growth within the village boundary of Werrington. <p>If the above reasons are being used to justify Green Belt release in Werrington, then such justification is also applicable to Brown</p>	The respondent proposes that Policy H2 is amended to re-introduce land at Willfield Lane, Brown Edge (BE041) as a housing allocation as previously proposed. The Council considers that it has identified exceptional circumstances to justify Green Belt release elsewhere, and it is considered that those circumstances apply equally to Brown Edge where there is no scope for infill		No	No	<p>The omission site is within the green belt. It was in the Site Options consultation 2015 and the Preferred Options Sites and Boundaries consultation 2016 but was not taken forward.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends</p>	No

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					Edge because there is no capacity within the existing tightly drawn settlement boundary. Additionally, the local HNA by AECOM for Brown Edge confirms a need in excess of 80 dwellings, which is 15 dwellings above the 65 dwellings initially proposed for Brown Edge.	development.				<p>set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>The Brown Edge Housing Needs Assessment (HNA) was to advise Brown Edge Parish Council (BEPC) on housing need at a local level in order to inform the Neighbourhood Plan policies. The HNA was carried out in line with PPG guidance and is an assessment of need based on facts and unbiased evidence but it does not apply constraints to the assessment of need. The report recognises that there are numerous supply side constraints.</p> <p>Green Belt is a significant constraint in Brown Edge. It is considered that sufficient provision can be made elsewhere in the District to support development requirements. It is understood that the neighbourhood planning group is looking to assess housing needs in the Parish in more detail to inform the neighbourhood plan.</p> <p>Werrington is a defined as a larger village in the policy SS2 Settlement Hierarchy. The Green Belt Study considered the housing sites in Werrington are suitable for release from the green belt if there are exceptional circumstances. The Green Belt is tightly drawn around Werrington and there is limited capacity in the settlement for further growth. The settlement has a number of facilities and services and is considered to be a sustainable location to support some growth. The site is owned by the Ministry of Justice and is due to be transferred to Homes England via an approved land transfer programme. Homes England are proposing to carry out work to ensure the delivery of the housing through an appropriate developer. (See LPS337).</p> <p>It is therefore considered there are exceptional circumstances regarding this site which justify its release from the green belt to contribute to meeting the District's housing requirement.</p>	
LPS461	Housing Allocations	Policy H 2	Mrs Susan	Office and Publicity Manager	CPRE (Staffordshire) support the Council's general approach to Green Belt. However, they object to the removal of land from the Green Belt (e.g. Wharf Road Strategic Development Site and to					The majority of the Wharf Road Strategic Development Site is not in the Green Belt. The Green Belt part of the site is only the	No

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			Kneill-Boxley	CPRE Staffordshire	the south of the settlement on the area shaded in yellow and referred to on the interactive map as BD117.					<p>area known as 'BDNEW' to the west of the Biddulph Valley Way.</p> <p>The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p>	
LPS484	Housing Allocations	Policy H 2		Persimmon Homes North West	<p>Persimmon Homes have a pending application (SMD/2018/0180) concerning the land referred to as Cheadle North Strategic Development Area. This representation provides an update on the progress of the application to inform subsequent revisions of the Plan. It should be read in conjunction with previous representations submitted by Mosaic Town Planning on behalf of Persimmon Homes. Persimmon Homes support the allocation as a key strategic mixed use development site in the Local Plan.</p> <p>The site is considered to be a 'deliverable' development in that it is suitable, available and achievable, and could realistically be expected to contribute to the Council's 5 year housing land supply. The hybrid planning application seeks consent for up to 300 new homes, a 1FE Primary School, multi-use games area, allotments and associated open space. The application which comprises two phases of development will secure the delivery of 125 new homes, public open space and equipped play in the short term whilst also establishing a vision and framework for the remainder of the site, which will provide a further 175 homes and community facilities.</p> <p>It is considered appropriate to redefine the boundaries of the allocation to have regard to logical and existing established field boundaries; in this case Cecily Brook to the east, Froghall Road to the west and established field boundaries to the north and south. This would also align the boundaries of the allocation with that of the recently submitted planning application. Aligning the boundaries would present the opportunity to incorporate the brook into areas of open space as part of the comprehensive masterplan for the site, as well as enhancing opportunities for the long term management of the brook and its surroundings, as well as utilising the area for SuDS. Persimmon Homes therefore request that the Council revise the boundary; this would increase the allocation from 11.2ha to 12.55ha.</p> <p>Education</p>					<ul style="list-style-type: none"> Support for the site and provision of land for the primary school is noted. Para 9.73 clarifies that the development area is located in Flood Zone 1 – low probability and therefore the sequential test required by national policy has been met. It states that land to the east, outside the site in Flood Zones 2 and 3 could be used as open space / surface water mitigation. It is not therefore considered necessary to include this area within the development site. Policy SS12 covers the issue of planning obligations. 	No

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					<p>The company support the provision of the school, which due to its location, could help reduce the number of car-based trips travelling through the town centre. It is expected that as well as providing the land for the school, the company will make financial contributions towards the delivery of the school, secured by the S106 agreement associated with the Phase 2 development. Following pre-application discussions with the Council, it has been agreed that the school will be located centrally to both Phases 1 and 2 to allow full integration within the development.</p> <p>Highways</p> <p>Than planning application has been accompanied by a Transport Assessment, which contains further information regarding highways.</p> <p>Planning obligations and affordable housing</p> <p>Any planning obligations sought as part of the planning application should be (1) necessary to make the development acceptable in planning terms; (2) directly related to the development; and (3) fairly and reasonably relate in scale and kind. As such, Persimmon Homes encourage the Council to make suitable revisions to the relevant bullet points in Policy DSC1, to clarify that “such planning obligations will be sought subject to viability and where appropriate”.</p> <p>Coal mining</p> <p>A Coal Mining Risk Assessment was submitted as part of the application. The disused mine shafts do not preclude the development of the site subject to no development taking place directly over the mine shafts. Further details can be found in the assessment accompanying the application.</p> <p>Flood Risk</p> <p>The proposed development is within Flood Zone 1 and therefore at very low risk of flooding. The parts of the site within Flood Zones 2 and 3 will not be developed. Further details can be found in the Flood Risk Assessment and Engineering Appraisal submitted as part of the application.</p> <p>Ecology</p> <p>A full ecological assessment of the site, including an extended Phase 2 Habitat Survey, bat roost assessment of trees and water vole and otter survey was submitted as part of the application. The Ecological Assessment recommends further surveys for water vole and badgers, as part of any application associated with Phase 2.</p>						

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					<p>Socio economic impact and benefits</p> <p>The Cheadle North Strategic Development Area will secure the delivery of new community facilities, including a primary school, multi-use games area for school and community use, allotments, equipped play area and other associated open space. The scheme will also deliver a range of direct, indirect and induced economic impacts in the local area.</p> <p>In summary, it is considered that the allocation and development of the Cheadle North Strategic Development Area accords with the principles of the Framework, which applies a strong presumption in favour of sustainable development, stating that development should be granted unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits.</p>						
LPS507	Housing Allocations	Policy H 2	Ms Laura Clarke		<p>Respondent, in principle, supports the development of Site EN128. They do not, however, support the development of 20 homes. Their reasons for objection are based on poor access, increased risk of traffic congestion down Stoney Lane, increased pressure on drainage, loss of green space and increased visual impact from multi-storey development. Respondent considers the development of several bungalows would be more appropriate.</p>					<p>Support noted.</p> <p>With regards housing densities, Policy H1(c) expects development to be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area. It is assumed that higher densities will be appropriate in locations which are accessible by public transport.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the</p>	No

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										<p>character of the area.</p> <p>The site is allocated for residential development - the nature and type of the development is not specified. Policy H 1 of the Local Plan seeks to ensure there is an appropriate range and type of houses is provided that meets identified needs arising from changes to the population structure including special needs for the elderly. All new dwellings should provide flexible accommodation that is capable of future adaptation. It is therefore not considered necessary to restrict this site for elderly accommodation.</p> <p>New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p>	
LPS542	Housing Allocations	Policy H 2	Muller Property Group		The respondent maintains their support for this policy.					Support noted.	No
LPS445	Housing Allocations	Policy H 2	Richard House	Gladman	Gladman do not consider the reasons given for the amendment to the Green Belt for the Tunstall Road Strategic Development Area to represent exceptional circumstances.	Additional sites should be allocated for housing development in sustainable locations outside the Green Belt, including land at Wallfield Close, Upper Tean.	Yes	No	Yes	<p>The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively as well as those site specific reasons set out in paragraph 9.53 of the Local Plan, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p>	No
LPS446	Housing Allocations	Policy H 2	Richard House	Gladman	Gladman do not consider the reasons given for the amendment to the Green Belt for the Moberley Strategic Development Area to represent exceptional circumstances.	Additional sites should be allocated for housing development in sustainable locations outside the Green Belt, including land at Wallfield Close, Upper Tean.	Yes	No	Yes	Paragraph 9.82 explains that 'The Green Belt Review recommends that the area could be considered for release 'under exceptional circumstances'. Currently there is no direct access to the undeveloped area within the town development boundary via the existing road network. Access to the area can be achieved via land north of the veterinary practice which is currently in the Green Belt. There are considered to be exceptional circumstances to release this small section of Green Belt to be able to gain access to this area.'	No
LPS447	Housing Allocations	Policy H 2	Richard House	Gladman	Gladman seek the allocation of land at Wallfield Close, Upper Tean. The site is currently used for grazing and extends to approximately 6.15 hectares. The site is well defined and bordered by existing residential development to the north and represents a logical extension to the settlement. It has capacity to accommodate up to 150 dwellings with 33% affordable housing.	Additional sites should be allocated for housing development in sustainable locations outside the Green Belt, including land at Wallfield Close, Upper Tean.	Yes	No	Yes	The omission site is a large site to the south of Upper Tean. A small part of the site was in the SHLAA, site UT024, which was assessed as a B site and was included in the Site Options consultation 2015. The site was identified in the Landscape and Settlement Character Assessment (2008) as important to the landscape setting of Upper Tean. It was not taken forward to	No

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					<p>In accordance with the NPPF, the site is deliverable, being a suitable location for development, available now and with a realistic prospect that its development would be fully delivered within 5 years.</p> <p>Upper Tean has a good range of services and facilities including a primary school, post office, shops, pubs and places of worship. All of these are within walking and cycling distance of the site.</p> <p>The site itself is not subject to any formal heritage or environmental designations and is not situated within a Conservation Area.</p>					<p>the Preferred Options Sites and Boundaries consultation 2016.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Local Plan includes a residential allocation in Upper Tean and there have been resolutions to grant approval for two planning applications for residential development SMD/2016/0811 Land off Tenford Lane 49 dwellings (awaiting S106) and SMD/2015/0424 approval for up to 67 dwellings.</p> <p>It is considered that the Local Plan allows for the sustainable growth of Upper Tean in line with the spatial strategy.</p>	
LPS553	Housing Allocations	Policy H 2	Wainhomes (North West) Limited		<p>Agent's client owns the land off Wardle Gardens, Leekbrook, for residential development. They believe that this land should be included within the Plan.</p> <p>The site is partly previously developed, and was historically part of the former Joshua Wardle industrial site. The redevelopment of the wider Joshua Wardle site was granted outline planning permission in 2003 (03/01097/OUT). The outline permission was for 4.7 hectares of residential and 1.8 hectares of industrial development. The site together with the adjacent Council owned land to the east was identified for light industrial use as part of the outline planning permission. Reserved matters approval was granted for the residential development in 2004 (04/00194/REM) and subsequently implemented. However, the subject site was not included within the 2004 reserved matters application.</p> <p>Wainhomes has submitted two planning applications for residential development on land at the site (LPA refs: SMD/2014/0544 & SMD/2017/0387). Planning permission was refused in both instances due to the loss of employment land, detailed design issues and technical matters relating to flood risk and ecology. It is considered that the technical reasons for refusal in relation to flood risk and ecology are not insurmountable and can be addressed.</p>			No	No	<p>The northern employment element of the 2003 mixed use approval may have expired without submission of reserved matters. However, the site is still considered an employment site by virtue of E3 of the Local Plan. The grounds for refusal for recent housing application SMD/2017/0387 included that the applicant had not produced robust evidence to demonstrate that the site would not be viable or suitable for continued employment use, as required by the Council's employment land retention policy.</p> <p>Most of the site is covered by Flood Zone 3. The Council would apply its Flood Risk policy SD5 and applicable NPPF policies in determination of proposals. The Council's natural environment policies are set out in Poles NE1 and NE2.</p>	No
LPS474	Housing Allocations	Policy H 2	Renew Land Development Ltd.		<p>This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at Newpool Farm, Newpool Road,</p>		Yes	No	Yes	<p>This large area of land has 3 separate SHLAA records because only a small part of it – BD063a – is categorised as being potentially suitable for development in the Council's Strategic</p>	No

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					<p>Knypersley, Biddulph.</p> <p>Policy H2 proposes the allocation of three sites on the edge of Biddulph for housing development, one of which involves a proposed amendment to the Green Belt (see Map A2.1 Biddulph). It is proposed that Policy H2 is amended to include additional proposed housing allocations at Newpool Farm as detailed below, to provide an enhanced prospect of the Council meeting its full objectively assessed housing need.</p> <p>The allocation of additional land for housing in Biddulph would enhance the prospects of the open market and affordable housing needs of the town (and in turn the district) being met within the plan period, which would in turn support the delivery of sustainable communities in terms of both meeting housing needs and supporting local services.</p> <p>It is also considered that there would be sustainable benefits and justification for increasing the housing allocations in Biddulph, given the good range of existing services in the town and the proposed employment and mixed alternative use allocations in Biddulph. Biddulph has the infrastructure and facilities to accommodate additional housing/growth, and additional development would have knock-on benefits from provision of additional housing to that currently proposed in the town. Such benefits would include local economic benefits through additional spending in the town centre and at other local facilities and ultimately additional support for the future sustainability and growth of local services.</p> <p>Further justification for increasing the housing allocations in and around Biddulph is the fact that it is proposed to allocate employment and mixed alternative use sites in the area. The delivery of more homes in the Biddulph area in tandem with the job creation associated with those site allocations would enhance the sustainability of the local area, including by providing increased opportunity for existing and future employees at businesses within Biddulph to live locally (therefore reducing the need to travel).</p> <p>Newpool Farm</p> <p>Part of the site at Newpool Farm is being promoted for development by Renew Land Developments Limited. This part of the site was initially included as a preferred housing allocation (with associated Green Belt amendment) in the Preferred Options Sites and Boundaries consultation but removed in the Preferred Options consultation. This representation relates to Site BD063a and additional land immediately to the west (see Figure 1 in attached).</p> <p>On the basis of the site proformas that were appended to the 19th July 2017 report to the Council Assembly, Renew Land Developments Limited understand that Site BD063a was removed as a housing allocation from the Plan as it was replaced with an</p>					<p>Housing Land Availability Assessment (SHLAA). The rest is C class (i.e. undeliverable) due to its scale as well as having no clear external boundaries to prevent unchecked incursion into the Green Belt.</p> <p>Green Belt release around Biddulph has been minimised in the Local Plan and the capacity of this whole area would far exceed the level needed to meet Biddulph's housing needs to 2031.</p> <p>BD063a has been included in previous consultations – Site Options and Preferred Sites and Boundaries (as a smaller variant in line with the recommendation in the Council's Green Belt Review). However, its inclusion is not clear cut as the Green Belt Review states that “a smaller variant of this site (BD063a), bounded by an unmade road to the west (off Newpool Road) might be acceptable, but there are better options to the west of Biddulph.”</p> <p>BDNEW is an expansion of an existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p>	

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					<p>alternative Green Belt site adjacent to Wharf Road. The proformas also confirm that objections were raised by members of the public on a number of issues (such as infrastructure, ecology, landscape, flood risk, etc.), but the Council's own assessment of those objections and the site overall did not raise any material concerns about the potential development of the site.</p> <p>There are no material technical objections that can be sustained to justify the removal of Site BD063a as a proposed housing allocation. As such, Site BD063a should be re-instated into the Local Plan as a housing allocation (within Policy H2) in order to provide an enhanced prospect of the Council meeting its full OAN. It is also considered that the additional land subject to this representation, to the west of Site BD063a offers the potential for an enlarged housing allocation in this location.</p>						
LPS561	Housing Allocations	Policy H 2	Renew Land Development Ltd.		<p>This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at Hurst Quarry, Hurst Road, Biddulph.</p> <p>Policy H2 proposes the allocation of three sites on the edge of Biddulph for housing development, one of which involves a proposed amendment to the Green Belt (see Map A2.1 Biddulph). It is proposed that Policy H2 is amended to include additional proposed housing allocation at Hurst Quarry as detailed below, to provide an enhanced prospect of the Council meeting its full objectively assessed housing need.</p> <p>The allocation of additional land for housing in Biddulph would enhance the prospects of the open market and affordable housing needs of the town (and in turn the district) being met within the plan period, which would in turn support the delivery of sustainable communities in terms of both meeting housing needs and supporting local services.</p> <p>It is also considered that there would be sustainable benefits and justification for increasing the housing allocations in Biddulph, given the good range of existing services in the town and the proposed employment and mixed alternative use allocations in Biddulph. Biddulph has the infrastructure and facilities to accommodate additional housing/growth, and additional development would have knock-on benefits from provision of additional housing to that currently proposed in the town. Such benefits would include local economic benefits through additional spending in the town centre and at other local facilities and ultimately additional support for the future sustainability and growth of local services.</p> <p>Further justification for increasing the housing allocations in and around Biddulph is the fact that it is proposed to allocate employment and mixed alternative use sites in the area. The delivery of more homes in the Biddulph area in tandem with the job creation associated with those site allocations would enhance the sustainability of the local area, including by providing</p>		Yes	No	Yes	<p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in the policy. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	No

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					<p>increased opportunity for existing and future employees at businesses within Biddulph to live locally (therefore reducing the need to travel).</p> <p>Hurst Quarry</p> <p>Renew Land Developments Limited propose that further consideration is given to the potential allocation of land at Hurst Quarry for housing development. Although the site is washed over by Green Belt, it has a history of use as a quarry (see Figure 3 in the attached).</p> <p>While the site's planning history includes details of an approved restoration plan for the quarry element of the site (i.e. excluding the industrial premises at the front of the site), under European legislation the site can continue to be used as a quarry for many years to come. However, if this were the case, it would result in considerable further damage to the landscape. A sensitively designed residential development of the site on the other hand presents the potential to bring forward the ceasing of quarrying activity at the site.</p> <p>In order to respect the site's position in the Green Belt, the landowner is minded only to promote residential development of the parts of the site that have been subject to previous quarrying activity (which are naturally at a lower level than the surrounding land). These well contained parts of the site, a carefully designed residential scheme and associated landscape strategy, would deliver a high quality housing scheme of low prominence/visual impact.</p> <p>An outline planning application for residential development (up to 28 dwellings) was submitted in 2016 and later withdrawn (reference SMD/2016/0127). A resubmitted outline application for the same development is currently before the Council (reference SMD/2017/0129).</p>						
LPS449	Housing Allocations	Policy H 2	Ms Victoria Degg		<p>With regard to Site EN128, respondent suggests that the planners visit Brookfield Avenue at the start and finish of the school day. At such times it is very difficult to negotiate the road, either in a vehicle or on foot. This will be made much worse if the development of 22 dwellings goes ahead.</p>			No		<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p>	No
LPS468	Housing Allocations	Policy H 2	Mr Mark Bullock		<p>This representation is submitted on behalf of the landowner of Park Lane, Cheadle (Site CH165). Attached are the SHLAA submissions prepared by John Rose Associates.</p> <p>Policy H2 proposes the allocation of seven sites in Cheadle (covered by Policies DSC1, DSC2 and DSC3), one of which involves</p>		Yes	No	Yes	<ul style="list-style-type: none"> • CH165 was considered as part of the Green Belt Review Study and the overall impact of development on the purposes of the Green Belt was considered to be significant. <ul style="list-style-type: none"> ○ Check unrestricted sprawl – contribution ○ Prevent towns merging – limited 	No

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					<p>a proposed amendment to the Green Belt (see Map A3.1 Cheadle). It is proposed that Policy H2 is amended to include an additional proposed housing allocation at Site CH165 (Park Lane, Cheadle). This land can provide an enhanced prospect of the Council meeting its full objectively assessed housing need.</p> <p>Site CH165 is a technically sound/deliverable housing site with a willing land owner and despite its Green Belt status, is in a highly accessible and sustainable location close to (within a short walking distance of) Cheadle Town Centre. There are good public transport connections and a wide range of local amenities. The allocation of this site is therefore preferable to the allocation of land elsewhere on the edge of Cheadle (both within and outside the Green Belt) from an accessibility/sustainability perspective. Furthermore, the lower half of the site, which could come forward/be allocated on its own, effectively comprises an infill site. The landowners consultation with the owners of neighbouring properties has also established that they would have no objection to this site coming forward for housing development.</p> <p>Due to the infill nature of this site, it is considered that its development would have a low impact on the purposes of including land in the Green Belt as compared to other larger and more prominent and open Green Belt alternatives that have been considered by the LPA in the past. Mindful of the site's characteristics and the form, character and appearance of the existing development adjoining the site, it is considered that it lends itself to provision of single storey dwellings (bungalows) that would suit the ageing population.</p>					<ul style="list-style-type: none"> ○ contribution <ul style="list-style-type: none"> ○ Safeguarding from encroachment – significant contribution ○ Setting of towns – significant contribution ● The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances and the recent Housing White Paper reiterates this commitment. ● Although the site is in a sustainable location close to the town centre and development would be of a much more limited scale (5 dwellings compared to an indicative 26 dwellings) the Green Belt review considers that development in this location would create an unacceptable intrusion into open countryside on rising land. It is considered that there are no exceptional circumstances to justify amendment of the Green Belt boundary in this location. There are other housing sites available in Cheadle not located in the Green Belt. ● Land is identified as important landscape setting to Cheadle in the LCA. 	
LPS521	Housing Allocations	Policy H 2	Mr Robert Simcock		<p>Sites BD068 and BD087 were proposed for the development of up to 100 dwellings. However, these two sites have been replaced by Site BDNEW. This is despite the 2015 Green Belt Review recommending their removal from the Green Belt due to their suitability for housing development. Furthermore, both sites are located within close proximity to services and facilities, are both bound by residential development and used to contain a gardening and retail business. Neither site is likely to flood. Additionally, Inspector Whithead considered potential development sites around Biddulph when examining the Core Strategy, and directly referenced the Gillow Heath sites (BD068 and BD087). He did not have regard to the much larger area now proposed, BDNEW.</p> <p>The area in which BDNEW falls contributes to three of the five purposes of designating Green Belt land (checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging into one another; and assisting in safeguarding the countryside from encroachment). This was a higher score than Sites BD068 and BD087. Yet no explanation has been given by the Council as to why BDNEW was chosen over the other sites. BDNEW also scored poorly in the review of additional sites in April 2017.</p> <p>Additionally and with regard to Comment SA68, the Local Plan</p>				No	<p>Sites BD068 and BD087 were included as an option in the 2015 'Site Options' consultation and in the 2016 'Preferred Option Sites and Boundaries' consultation. However, following the emergence of an alternative more preferable site, these sites were removed from the plan in 2017. Also, in their response to the Submission Version Local Plan, United Utilities (whose water treatment works is immediately adjacent to BD068) states that "United Utilities wishes to reiterate its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure." (LPS391)</p> <p>The Core Strategy Inspector states that sites in the Green Belt at Gillow Heath 'could' form the basis for small urban extensions. He also states that "it would clearly be premature and therefore inappropriate to give detailed consideration to those sites at this stage".</p> <p>The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's</p>	No

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					should be amended to properly take account of a lawful SA.					<p>housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>BD068, BD087 and BDNEW have all been assessed as being suitable for release from the Green Belt subject to demonstration of exceptional circumstances in the Council's Green Belt Review. In determining which sites should be included in the Local Plan, the Council must balance relevant evidence, Government planning policy and public opinion.</p>	
LPS452	Housing Allocations	Policy H 2	Mrs Dean		<p>Respondent is opposed to the development of Site EN128 because it is not, in any way, suitable or beneficial for the local area.</p> <p>Unlike other avenues and roads, Brookfield Avenue experiences major problems and dangers associated with traffic. This is especially the case at peak periods during school days. Cars entering or leaving the avenue are faced with over parking and a sharp blind bend into Hazelwood Road and Stoney Lane, making it dangerous for pedestrians as well as drivers. The respondent has seen cars and vans mount the pavement here, so as to avoid accident. The development of Site EN128 will only add to these problems.</p> <p>Site EN128 is a vital part of the rural aspect of Endon and should remain so. A very large proportion of residents are opposed to this development.</p>				<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p>	No	
LPS454	Housing Allocations	Policy H 2	Ms Debbie Barra		<p>Respondent is against the development of Site EN128. Their reasons are as follows:</p> <ul style="list-style-type: none"> • Dollisfield (Site EN128) has previously been a designated open space. • The site is unsuitable due to its location in relation to Brookfield Avenue, which experiences high levels of traffic. School traffic in the area is a serious concern. • Flooding is a major problem that brings water from Stoney Fields and the overloaded drains. • The proposed 22 properties for this site do not fit with the properties in the immediate area and are not sympathetic to the type and period of adjacent properties. • The vicinity of Brookfield Avenue is already overloaded and will put pressure on Brookfield Avenue as a main 				<p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility</p>	No	

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					<p>access route to facilities. The development is totally unreasonable and will have a negative effect on the community.</p> <ul style="list-style-type: none"> • There are other sites with better access, more space and which are less intrusive than Site EN128. • The development will result in the demolition of a perfectly sound, habitable property on Brookfield Avenue, in order to gain access to the site. This will change the character of the area. 					<p>and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>Other potential sites around the periphery of Endon lie within the Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p> <p>Note the allocation proposed in the submission version Local Plan does not include no 14 Brookfield Avenue; the allocation now includes corner property 'Stoneybrook'. Demolition or redevelopment schemes would be considered against the Council's amenity policies.</p>	
LPS502	Housing Allocations	Policy H 2	J Evans		<p>Respondent objects to housing allocation EN128 on the grounds of inappropriate access arrangements, adverse impact on traffic congestion and safety, increased pressure on roads in terms of general wear and drainage, and increased environmental pressure on local wildlife.</p>					<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals</p>	No

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										<p>to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence including ecological evidence to justify its selection of proposed allocation sites from wider sites. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. EN128 was subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Extended Phase I survey for EN128 concluded that the site had fairly low biodiversity value "<i>The site has fairly low biodiversity value overall and the site is set within a mainly urban environment with poor connectivity to the wider countryside.</i>" The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	
LPS506	Housing Allocations	Policy H 2	Trevor Clarke		Respondent objects to housing allocation EN128 on grounds of poor access, increased traffic congestion, reduced road safety to schoolchildren and increased pressure on the drainage system on surrounding roads. The respondent also considers the development is excessive in size and will put pressure on local services, including schools and local surgeries.					<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and</p>	No

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										<p>residential amenity.</p> <p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p>	
LPS508	Housing Allocations	Policy H 2	D Clarke		Respondent objects to housing allocation EN128 on the grounds of adverse effect on local character, unsuitable access, increased traffic on nearby roads, increased risk of flooding, increased pressure on local services and increased pressure on parking.					<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be</p>	No

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										<p>provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p>	
LPS488	Housing Allocations	Policy H 2	K Morrell		<p>The respondent objects to site EN128. The reasons for objection are firstly the site will result in decreased road safety, particularly for local school children on Brookfield Avenue. Secondly, proposed access to the site is considered inappropriate as it would contravene highways regulations. The respondent believes Dollisfield should be reinstated as a significant area of Visual Open Space and therefore be protected from development. The respondent notes that the development will increase risk of flooding.</p>					<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p>	No
LPS489	Housing Allocations	Policy H 2	V Morrell		<p>The respondent objects to site EN128. The reasons for objection are firstly the site will result in decreased road safety, particularly for local school children on Brookfield Avenue. Secondly, proposed access to the site is considered inappropriate as it would contravene highways regulations. The respondent believes Dollisfield should be reinstated as a significant area of Visual Open Space and therefore be protected from development. The respondent notes that the development will increase risk of flooding.</p>					<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at</p>	No

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										<p>the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p>	
LPS559	Housing Allocations	Policy H 2	Dr Anil Vaghmaria		<p>The residents of Brookfield Avenue are concerned about this large development behind their avenue. 22 houses means a minimum of 22 cars, and all the hazards this entails from both a safety point of view and a health point of view.</p> <p>The loss of open green space opposite the school is going to significantly affect the landscape. The flood risk is also a concern and will need to be addressed very carefully. Furthermore and as mentioned previously, the increase in noxious fumes in the immediate vicinity of the development will affect air quality.</p>			No	Yes	<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The site is within the village boundary of Endon and is surrounded by existing residential development. Any new development taking place will be subject to policies contained within the new Local Plan, which seek to protect the character of the area consideration will be given to the scale of development and its impact on the surrounding area. Policy DC1 details design considerations for new development and states development should be well designed and contribute to the character of the area.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and</p>	No

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										<p>regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development.</p> <p>With regards housing densities, Policy H1(c) expects development to be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area. It is assumed that higher densities will be appropriate in locations which are accessible by public transport.</p> <p>The site is allocated for residential development - the nature and type of the development is not specified. Policy H 1 of the Local Plan seeks to ensure there is an appropriate range and type of houses is provided that meets identified needs arising from changes to the population structure including special needs for the elderly. All new dwellings should provide flexible accommodation that is capable of future adaptation. It is therefore not considered necessary to restrict this site for elderly accommodation.</p>	
LPS533	Housing Allocations	Policy H 2	Mrs J M Belcher		The respondent considers the Plan unsound. This is due to the allocation of larger sites over smaller sites. The respondent specifically references the housing allocated to the larger Blythe Vale site without consideration of smaller sites, namely BB027 and BB028 which are considered more appropriate.	SMDC should consider smaller allocations in their Local Plan, specifically Sites BB027 and BB028 which are within 500m of train and bus stops.		No		<p>Sites BB027 and BB028 were previously included the Site Option consultation 2015 but were not taken forward. The sites are within the green belt. The Green Belt Study Review provides a detailed site based assessment of land which could be considered for review and concluded that these sites were not suitable for release from the green belt.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this</p>	No

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										<p>commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>The Highway Authority advised that the access road to the site was unadopted and would need to be improved. The Phase 1 Ecological Study highlighted there was a Biodiversity Alert Site (BAS) immediately to the south of the site and recommended the creation of a landscaped buffer between the site and BAS.</p> <p>The Blythe Vale site is not in the green belt and its allocation contributes towards the Local Plan meeting the housing requirement in line with the principles of the Spatial Strategy without removing a significant number of sites from the green belt.</p>	
LPS535	Housing Allocations	Policy H 2	Mrs S J Malpass		The respondent considers the Plan unsound. This is due to the allocation of larger sites over smaller sites. The respondent specifically references the housing allocated to the larger Blythe Vale site without consideration of smaller sites, namely BB027 and BB028 which are considered more appropriate.	SMDC should consider smaller allocations in their Local Plan, specifically Sites BB027 and BB028 which are within 500m of train and bus stops.		No		<p>Sites BB027 and BB028 were previously included the Site Option consultation 2015 but were not taken forward. The sites are within the green belt. The Green Belt Study Review provides a detailed site based assessment of land which could be considered for review and concluded that these sites were not suitable for release from the green belt.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>The Highway Authority advised that the access road to the site</p>	No

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										<p>was unadopted and would need to be improved. The Phase 1 Ecological Study highlighted there was a Biodiversity Alert Site (BAS) immediately to the south of the site and recommended the creation of a landscaped buffer between the site and BAS.</p> <p>The Blythe Vale site is not in the green belt and its allocation contributes towards the Local Plan meeting the housing requirement in line with the principles of the Spatial Strategy without removing a significant number of sites from the green belt.</p>	
LPS557	Housing Allocations	Policy H 2	Mrs Bridge		<p>The respondent expresses concern regarding Site EN128. The development site is considered unsound as the site is subject to access restrictions. The respondent states the land should be green open space for wildlife habitats. The respondent also expresses concern that the development will have detrimental effect on traffic congestion and road safety in surrounding roads, including increased risk to local schoolchildren.</p>			No		<p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p>	No
LPS483	Housing Allocations	Policy H 2	P Buck		<p>Respondent objects to the development of The Mount (LE066, LE128a&b, LE140, and LE142&b) for the following reasons:</p> <ul style="list-style-type: none"> • Development should not be proposed outside the boundary of Leek when there is land available within the town boundary. • The Mount is continually used by the community for walking, jogging, running, cycling, dog walking and for enjoying the landscape. • The development will be unsympathetic to the landscape character and quality of the area. • Development will result in an increase in noise levels/pollution in an area frequently used by the public. • It seems bias that such a large part of this area is up for redevelopment when other areas seem to have little or no redevelopment when they are in a better position for roads and exits out of the town for residents to commute. • The exist road onto Buxton Road is already dangerous, especially during winter. The road sinks near the estates and yet the repairs do not last long before becoming 					<p>The consultation Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.</p> <p>The public open spaces/Local Green Spaces proposed by the Council are those mapped in the consultation Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance</p>	No

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					<p>dangerous. There would also be increased congestion at the junction, causing safety issues.</p> <ul style="list-style-type: none"> • If Sites LE142a and LE142b exit onto Mount Road, then you will have a 3 estate junction, all within a short distance of one another. • The road infrastructure in Leek will not cope with an increase in car numbers. • Development would cause disruption during construction as waste, gas etc. would need to be laid. • Services within the area need to be increased before any development takes place. This is because there is already a shortage of GPs, nurses, social services, community services, etc. • The proposed location for the new school does not seem to be the right place as there are more spaces near Churnet View School. • With regard to the wind turbine, a parliamentary bill was passed in 2010-2011 which states that houses should not be built within 1,000m of a wind turbine if it is between 25m and 50m tall. If the wind turbine is between 50m and 100m tall, the minimum distance for a residential house is 1,500m. • According to the Office for National Statistics, there is a need for 2,075 houses between 2011 and 2031. There are already permissions granted and houses built which leaves approximately 575 houses needed for the whole of the Moorlands until 2031. Why, therefore, do so many houses need to be built on The Mount? In the future, the land may be required for growing food. It is unknown what impact Brexit will have on supplies and the cost of them. • According to the Office for National Statistics, the jobs for the area will only increase by 8 within the period. Also, most of these residents will be commuting either Stoke or Macclesfield way. • Lastly, the respondent challenges why we need so many houses when according to local papers, there are lots available to rent or buy. There are also old mill buildings that are deteriorating which could be renovated. 					<p>for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. Mount Road is a vehicular highway.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development.</p> <p>The Council uses evidence to justify its selection of proposed allocation sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council selects proposed allocation sites.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022/ LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate).</p> <p>Problems arising from the construction period of any works, e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Acts) are not material planning considerations.</p>	

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										<p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>The Council consults with SCC Education during Local Plan preparation, and SCC have indicated a need for additional first and middle- school land provision in Leek resulting from the town's development requirements. These are laid out in the Submission Version Local Plan. Site ADD01 is identified for the necessary expansion of Churnet View Middle School (if this site were allocated for the new first school site instead, middle school expansion would need to occur elsewhere in the town). Note SCC Education support both the location of the proposed Middle School expansion at Horsecroft; and the location of the new First School on the Mount, in the Local Plan (as the proposed location of the First School adjacent to the high school site offers potential for sharing of facilities e.g. playing fields).</p> <p>The Council would assess residential schemes in proximity to approved wind turbines in accordance with Local Plan and NPPF amenity Policies, and ETSU (as amended) noise criteria etc. Note the Kniveden Farm turbine (SMD/2012/0760) was found acceptable by planning inspector on appeal and blade glint was not identified as an issue. Environmental Health conditions were attached to the consent pertaining to noise emissions. The Wind Turbines (Minimum Distance from Residential Premises) Bill 2012 was never enacted in Law, therefore has no status in either the determination of planning applications of wind turbines near housing, or conversely, housing near wind turbines.</p> <p>Need for additional housing stems from a number of factors, for example household formation, immigration, linkages with future workforce, and other factors. The NPPF makes clear that household projections are the starting point for assessing housing needs; however these additional factors should also be taken in to account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration</p>	

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										<p>empty properties in the Moorlands, and the anticipated effects of Brexit. In 2017 the Government announced a public consultation over proposed changes to the way housing need is calculated by Local Authorities.</p> <p>The Council is required to demonstrate how it will provide for its residual employment land requirements for Leek to 2031; and the Council considers it appropriate to identify additional employment land for Leek across a range of locations across Leek and Leekbrook, with good access to main roads such as the A520, to provide choice in locations to at least meet this requirement.</p>	
LPS13	Affordable Housing	Policy H 3	Mr Paul Bain		<p>Additional information added to this representation was received on 1st April 2018.</p> <ul style="list-style-type: none"> Although one area, Capri, is allocated in the Plan for low cost housing, respondent does not feel this allocation will sustain low cost housing development to 2030. Respondent gives example in Alton (Alverton Court) where 16 two bedroom starter homes were granted planning permission, but the proposals were then relaxed by Staffordshire Moorlands to 5 executive villas (built in 2016). This is not consistent with national policy. The two bedroom starter homes initially proposed at Alverton Court would have attracted three times more residents, many of which would have been attracted by employment opportunities at Alton Towers. It is therefore not clear why the Council approved the 5 executive villas. The Local Plan currently has no specific provision for low cost homes. As such, there appears to be no commitment from the Council to adopt national policy. Respondent requests that Staffordshire Moorlands provide evidence that future population trends have been studied/predicted, and that sustainable future low cost housing is identified within the Local Plan. Respondent makes reference to 'A History of Alton and Farley', which covers population trends. Respondent recommends that a similar study is conducted, which takes account of the higher proportion of residents enjoying longer retirement. The LPA should also investigate the parcel of land on the junction with Town Head and Back Lane (in the village of Alton). The Local Plan indicated exclusion of a parcel of land at this junction, which appears ideal for future low cost housing development (see 'Bain 4' attachment). The field should be investigated so that it can be confirmed whether it was part of the Tithe map and therefore part of the parish boundary too (see 'Bain 8' attachment, as well as extract from 'A History of Alton and Farley'). Respondent also states that the Council has not met its obligation with respect to its 'duty of care', in particular compliance with the 'NPPA' (assume NPPF) and the 	<ul style="list-style-type: none"> The applicant suggests that the Plan is altered to include specific reference to low cost housing allocations, in accordance with national policy. Respondent requests that Staffordshire Moorlands provide evidence that future population trends have been studied/predicted. Respondent also suggests that the Council's planning process is reviewed to include a requirement that where the Local Plan identifies a parcel of land as low cost housing, this usage is maintained and not changed in the future. This will prevent the Council from being unduly influenced by developers who are keen to maximise their return on investment. 	No	No	No	<p>The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing.</p> <p>In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range.</p> <p>Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage.</p> <p>Land at Capri (AL012) in Alton is not specifically allocated for low cost housing. Policy H3 sets out how affordable housing will be delivered. In the villages a target of 33% affordable housing should be provided on sites that could accommodate 5 dwellings (0.16 hectares) or more. Policy H3 also allows for small schemes on the edge of villages for 100% affordable housing on suitable rural exceptions sites.</p> <p>The site suggested on land between Town Head and Back Lane is adjacent to the settlement boundary and in the Conservation Area, there are potential heritage constraints. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages.</p>	No

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					need to specifically plan for low cost housing within the Plan.						
LPS55	Affordable Housing	Policy H 3	West Midland HARP Planning Consortium		<p>According to the West Midlands HARP Planning Consortium, the Council has set a low annual affordable housing target of 330 dwellings per annum. Whilst this is substantially higher than historic levels of delivery it is very concerning that the Council will not deliver sufficient housing to meet local housing need. The Plan fails to meet the existing backlog of affordable housing provision (408 affordable dwellings altogether, per annum). The Plan is not positively prepared because it fails to plan to meet need.</p>			No	No	<p>The Local Plan does not set an affordable housing target. The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing.</p> <p>In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range.</p> <p>Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage.</p>	No
LPS56	Affordable Housing	Policy H 3	West Midland HARP Planning Consortium		<p>According to the West Midlands HARP Planning Consortium, the affordable housing thresholds set out in this policy, whilst carrying forward the Core Strategy policy, are unusually high and should be reviewed once more to ensure the Council is maximising its affordable housing supply. The Council could test whether a lower figure could be viably used as small sites of between 11 to 15 dwellings contribute a significant amount to delivering affordable housing across the region and commuted sums rarely translate to the same amount of affordable housing provision that would have been provided if the obligation were required on site.</p> <p>It is notable that following a Written Ministerial Statement the PPG was amended to state "Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floor space of no more than 1,000 square metres (gross internal area)" (Paragraph: 031 Reference ID: 23b-031-20161116).</p> <p>It is further important to note that the proposed changes to the NPPF, currently subject to consultation, incorporate the above approach, seeking affordable housing delivery from schemes of 11 units and above in towns. The Council has not published an up-to-date viability appraisal of the policy approach as set in the Submission Version, which is a cause for concern. Without publication of a viability appraisal it is not possible to provide further detailed comment on whether the policy is deliverable, and this should be remedied prior to the Plan being submitted for examination. The policy wording is not considered to be effective as it includes the following line: "The actual level of provision will be determined through negotiation taking into account</p>			No	No	<ul style="list-style-type: none"> No comments were received in relation to the affordable housing thresholds during the Preferred Options Local Plan consultation and therefore the threshold of 15 for the towns set in the Core Strategy was carried forward unchallenged. Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage. The Local Plan and Site Allocations Viability Study also considers the viability of small windfall sites of 5 and 10 dwellings across 4 zones within the Staffordshire Moorlands. These zones cover different parts of the rural areas and the Study indicates that some zones could support 33% affordable housing, whereas others can support between 10 and 20%. The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing. In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range. Since the Ministerial Statement in November 2014 there have been a number of planning applications approved for schemes between 5 and 10 dwellings in the rural area totalling 49 dwellings which could have achieved up to 16 affordable units if the threshold of 5 had been 	No

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					<p>development viability and other contributions”.</p> <p>The policy wording seeking a ‘target’ of 33% affordable housing on-site too openly invites developers to offer affordable housing below this level. The same approach of allowing for negotiation can be achieved by setting this as a minimum level from which deviation can be exceptionally achieved through viability evidence.</p> <p>The affordable housing mix set out within criteria 2 is too rigidly defined, giving little flexibility for discussion and negotiation as required for individual sites. Whilst the proposed tenure split reflects the evidence of the SHMA, the wording should be revised to reflect the range of affordable housing types as set out in the proposed changes to the Draft NPPF Consultation Draft (2018).</p> <p>This should take account of each of the categories of affordable housing set out in the proposed amended annex: affordable homes for rent, starter homes, discounted market sales housing and other affordable routes to home ownership. The policy should also allow flexibility to ensure that the tenure split brought forward on individual sites reflects local housing need, the need to provide mixed and balanced communities, and to deliver viable development.</p>					<p>applied. Given the high level of affordable housing need in the District, particularly in the rural area, it is considered appropriate to maintain a 5 dwelling threshold.</p> <ul style="list-style-type: none"> Criteria 2 of Policy H3 includes the wording ‘Unless circumstances dictate otherwise and in agreement with the Council....’ in order to allow flexibility for discussion and negotiation. Note that the draft NPPF is still at consultation stage and the current NPPF still applies. 	
LPS324	Affordable Housing	Policy H 3	Mr Gez Willard	Willardwillard Ltd	<p>It is highly unlikely that the development sites within Staffordshire Moorlands will be able to meet such provision. Furthermore, this policy approach does not allow for current funding of RSL's and social housing providers. In addition to this it is clear from recent central government announcements (draft NPPF) that affordable housing targets and delivery and viability assessments are set for change. Lastly, the policy fails to take account of the exception from affordable housing obligations for smaller sites under 10 units and less than 1,000 sqm.</p> <p>It is suggested that clause 1 of the policy is amended to this effect: "A developer will be expected to provide affordable housing in line with government planning policy at the time along with any adopted supplementary planning guidance that the Council may prepare".</p>					<ul style="list-style-type: none"> The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing. In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range. Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage. The Local Plan and Site Allocations Viability Study considers the viability of small windfall sites of 5 and 10 dwellings across 4 zones within the Staffordshire Moorlands. These zones cover different parts of the rural areas and the Study indicates that some zones could support 33% affordable housing, whereas others can support between 10 and 20%. Since the Ministerial Statement in November 2014 there have been a number of planning applications approved for schemes between 5 and 10 dwellings in the rural area totalling 49 dwellings which could have achieved up to 16 affordable units if the threshold of 5 had been applied. Given the high level of affordable housing need in the District, particularly in the rural 	No

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										<p>area, it is considered appropriate to maintain a 5 dwelling threshold.</p> <ul style="list-style-type: none"> Note that the draft NPPF is still at consultation stage and the current NPPF still applies. 	
LPS346	Affordable Housing	Policy H 3	Mr Martin Webb		<p>Respondent argues that the affordable housing policy does not appear to have been subject to viability testing. No up-to-date assessment which reflects the sites and policies in the Local Plan is provided as part of the evidence base. The policy is therefore not justified and not consistent with national policy, specifically Paragraphs 173 and 174 of the Framework.</p> <p>In addition the respondent notes that the Policy does not have regard to the Ministerial Statement and the PPG in relation to not seeking affordable housing on sites of less than 10 dwellings/1,000sqm floor area. There is no justification for taking an approach which is inconsistent with the Government's policy.</p>			No	No	<ul style="list-style-type: none"> The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing. In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range. Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage. The Local Plan and Site Allocations Viability Study also considers the viability of small windfall sites of 5 and 10 dwellings across 4 zones within the Staffordshire Moorlands. These zones cover different parts of the rural areas and the Study indicates that some zones could support 33% affordable housing, whereas others can support between 10 and 20%. Since the Ministerial Statement in November 2014 there have been a number of planning applications approved for schemes between 5 and 10 dwellings in the rural area totalling 49 dwellings which could have achieved up to 16 affordable units if the threshold of 5 had been applied. Given the high level of affordable housing need in the District, particularly in the rural area, it is considered appropriate to maintain a 5 dwelling threshold. 	No
LPS364	Affordable Housing	Policy H 3	Mr Paul Hill	RPS Planning & Development	RPS does not dispute the fact that there is a considerable shortfall in affordable housing provision in the District. However, the 33% figure should be referenced as a maximum requirement as opposed to a target which could imply a requirement above that amount. The policy needs to be framed against evidence of what is commercially viable for development in the District, noting that, since the Core Strategy was adopted (2015), market conditions have changed.	Criterion 1(a) should be amended to refer to 33% being a maximum figure as opposed to a target figure.		No		<p>Council's viability study demonstrates that 33% affordable housing is not viable on all sites and therefore there is a need for some flexibility and the 33% should be seen as a target.</p> <p>It is not intended to seek a higher affordable housing requirement than 33% however in some cases there may be schemes that come forward where a higher proportion of affordable housing is proposed. It is therefore considered that the policy as worded provides this flexibility.</p>	No
LPS408	Affordable Housing	Policy H 3	Seabridge Developments Limited		This representation is submitted by an agent on behalf of Seabridge Developments Limited. There is an abundance of smaller and generally low value (affordable) housing in Biddulph and there is an acknowledged need for 'aspirational housing' as evidenced in the SHMA. Viability is also an issue in the area, where land values are not particularly strong and there are					<ul style="list-style-type: none"> Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can 	No

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					constraints and infrastructure costs to take into account. Seabridge Developments therefore consider that the affordable housing requirement for Biddulph (and possibly the other main towns) should be reduced from 33% to 25%, to ensure that the delivery of new homes in a District that has underperformed in the past is not stifled.					<ul style="list-style-type: none"> be considered at the application stage. Policy H3 states that the 'actual level of provision will be determined through negotiation taking into account development viability and other contributions.' which provides flexibility. It is not considered that the affordable housing requirement for Biddulph or the other towns should be reduced. 	
LPS413	Affordable Housing	Policy H 3	Wainhomes (North West) Limited		<p>Respondent argues that the affordable housing policy does not appear to have been subject to viability testing. No up-to-date assessment which reflects the sites and policies in the Local Plan is provided as part of the evidence base. The policy is therefore not justified and not consistent with national policy, specifically Paragraphs 173 and 174 of the Framework.</p> <p>In addition the respondent notes that the Policy does not have regard to the Ministerial Statement and the PPG in relation to not seeking affordable housing on sites of less than 10 dwellings/1,000sqm floor area. There is no justification for taking an approach which is inconsistent with the Government's policy.</p>			No	No	<ul style="list-style-type: none"> The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing. In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the top of the OAN range. Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage. The Local Plan and Site Allocations Viability Study also considers the viability of small windfall sites of 5 and 10 dwellings across 4 zones within the Staffordshire Moorlands. These zones cover different parts of the rural areas and the Study indicates that some zones could support 33% affordable housing, whereas others can support between 10 and 20%. Since the Ministerial Statement in November 2014 there have been a number of planning applications approved for schemes between 5 and 10 dwellings in the rural area totalling 49 dwellings which could have achieved up to 16 affordable units if the threshold of 5 had been applied. Given the high level of affordable housing need in the District, particularly in the rural area, it is considered appropriate to maintain a 5 dwelling threshold. 	No
LPS463	Affordable Housing	Policy H 3	Mrs Susan Kneill-Boxley	Office and Publicity Manager CPRE Staffordshire	<p>CPRE (Staffordshire) object to section 1 of Policy H3 because: (1) it lacks commitment to the provision of affordable housing; (2) it has an unambitious target of 33% affordable housing; and (3) the use of the sentence starting "The actual level of provision..." is unclear and ambiguous.</p> <p>Additionally, the text under section 2(b) is unclear and unexplained in the text which precedes the policy.</p>					<p>The SHMA 2017 Update identified an annual need for affordable housing of up to 432dpa. This is higher than the top of the recommended range for the objectively assessed need for housing.</p> <p>In line with the NPPG, the Council has considered the scope to uplift the overall level of housing delivery in order to increase affordable housing provision. This influenced the Council's decision to develop 320 homes per year which is towards the</p>	No

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										<p>top of the OAN range.</p> <p>Site viability has been considered during the preparation of the plan which seek to secure 33% affordable housing on sites above the specified thresholds. It is acknowledged that viability is limited in some instances and so out of necessity, some flexibility in the policy is provided so that viability can be considered at the application stage.</p> <p>Part 2 b) allows flexibility for other types of affordable housing such as renovation/improvement or redevelopment schemes.</p>	
LPS543	Affordable Housing	Policy H 3	Muller Property Group		The respondent maintains their support for this policy.					Support noted.	No
LPS443	Affordable Housing	Policy H 3	Richard House	Gladman	The proposed tenure split should be expressed as being indicative of the final split. This is critical because there are likely to be changes to the definition of affordable housing over the lifetime of the Local Plan, including in the short term with the Government's intention to bring starter homes within the definition. The final split will be determined by market conditions on a site by site basis.	The first part of this policy should state: "Indicatively 60% of all affordable dwellings provided on each site should be social/affordable rented housing with the remaining 40% being intermediate/starter homes although the exact split will be determined by market conditions on a site by site basis."	Yes	No	Yes	<p>Criteria 2 of Policy H3 includes the wording 'Unless circumstances dictate otherwise and in agreement with the Council...' in order to allow flexibility for discussion and negotiation.</p> <p>Note that the draft NPPF is still at consultation stage and the current NPPF still applies.</p>	No
LPS169	Gypsy and Traveller Sites and Sites for Travelling Showpeople	Policy H 4	Mr Yendole	Forward Planning Stafford Borough Council	<p>Stafford Borough Council note the need for 6 pitches by 2019 with a further 2 pitches over the plan period to 2034. However, no site to accommodate this need has been identified. This is despite the national policy requirement in Planning for Traveller Sites (August 2015).</p> <p>Stafford Borough Council also welcome the opportunity to enter into a Statement of Common Ground with SMDC for submission of the Local Plan.</p>					<p>Comments noted. In February 2018 the Council granted full permission for 3 pitches off Uttoxeter Road, Checkley. This leaves a residual requirement of 3 pitches to 2019. It is acknowledged this leaves a small deficit in provision.</p> <p>The residual needs for traveller accommodation in the Staffordshire Moorlands have repeatedly been described as 'modest' by appeal inspectors since 2008, which has been material in appeal decisions.</p> <p>Policy H4 maintains a series of criteria for determination of traveller site applications where these arise during the lifetime of the Local Plan.</p> <p>The Council has carried out extensive explorations with landowners and public bodies to identify a deliverable site with owner support; and has also conducted call for sites exercises during public consultations. However no suitable site has been identified.</p> <p>As part of its Duty to Cooperate under the Localism Act the Council investigated with neighbouring authorities including SBC the scope for provision of some/all of SMDC's residual requirement within neighbouring authorities. This did not elicit any positive responses, largely given the stages of preparation of adjacent authorities' Local Plans.</p>	No

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LPS288	Development in the Town Centres	Policy TCR 1	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England suggest minor amendments to the wording in section 6 of this policy (see Summary of modification).</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). Historic England's further comments in relation to the Council's response to their representation were: Intended as helpful advice to bring phrasing of the Local Plan in line with the NPPF and its wording in line with paragraph 151 (NPPF).</p>	Historic England suggest the following amendment to point 6 of this policy (changes shown in bold): "...principles to conserve or enhance the distinctive heritage of the town centres...".				It is considered that the existing wording of part 6 of the policy is adequate. Substituting the word 'improve' for 'conserve' in the context of the sentence is not considered necessary.	No
LPS98	Retailing and other Town Centre uses outside Town Centres	Policy TCR 3	Mr R Thorneycroft		The requirement for an impact and sequential assessment to be undertaken when proposals for retail and other town centre uses is 200 sqm or more should be increased to 300 sqm or more. This will help facilitate sustainably located everyday basket goods ('top-up') retailing, which would not undermine the vitality or viability of the town centre.					<p>The impact threshold of 200m2 set out in Local Plan Policy TCR3 was taken from the Council's evidence, namely the Retail Study published in 2013. A review of this threshold has taken place to ensure that it is still set at the right level taking into account national policy context, current and forecast retail trends and local circumstances.</p> <p>The findings from this review confirm that this threshold is appropriate and informed by robust evidence as follows:</p> <ul style="list-style-type: none"> The majority of units in Leek, Biddulph and Cheadle are relatively small and will be more susceptible to the impact of larger-scale retail development outside of the town centres. Town centre retailers will be more sensitive to the impacts arising from trade diversion as they would be less able to compete in terms of the size and range of their offer. The limited number of retailers in particular national multiples which occupy larger units within the town centres means that the extent of potential market share erosion will be greater as a result of trade diversion to larger scale developments in out of centre locations. The quantum of floor space involved would be much greater than that typically traded by retailers within the town centres. Reduced expenditure growth generated coupled with the effects of increased online shopping since 2013 means that there is insufficient capacity to help reduce or offset the impacts which would arise from potential future retail development in out-of-centre locations. So town centres would be more vulnerable in terms of trade diversion, thus warranting the need for an appropriate assessment of impact for development proposals in less sequentially preferable locations. 	No

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										<ul style="list-style-type: none"> The requirement to provide evidence around impact at this level should not be onerous - a proportionate approach can be applied in terms of scoping and extent of information required. 	
LPS192	Paragraph	8.78	Mr Andrew LeysSENS	LDF Assessor United Utilities Water Limited	<p>In accordance with their previous representations, United Utilities wishes to reiterate its preference for sensitive uses, such as residential, to be located away from their existing operational infrastructure. This is particularly relevant to their wastewater treatment works which are key operational infrastructure. United Utilities notes Policy DC1 and the associated supporting text. They recommend the inclusion of the following paragraph in the supporting text between paragraphs 8.78 and 8.79:</p> <p>"New developments near to existing wastewater treatment works will need to be carefully considered and demonstrate an acceptable environment for the proposed use through appropriate masterplanning and impact assessment in consultation with the Environmental Health Officer and the relevant water and sewage company."</p>					Comments noted. It is considered that the points raised are covered in the wording of Policy SD4 (Pollution and Water Quality).	No
LPS232	Paragraph	8.81	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) note how the Plan now makes reference to High Speed Broadband.					Comment noted.	No
LPS191	Design Considerations	Policy DC 1	Mr Andrew LeysSENS	LDF Assessor United Utilities Water Limited	<p>In accordance with their previous representations, United Utilities wishes to reiterate its preference for sensitive uses, such as residential, to be located away from their existing operational infrastructure. This is particularly relevant to their wastewater treatment works which are key operational infrastructure. United Utilities notes Policy DC1 and the associated supporting text. In particular, they note criterion 5. They recommend that it is amended so that it is clear that the amenity consideration relates to both proposed and existing properties in accordance with the below recommended amendment (changes shown in bold).</p> <p>"In particular, new development should: 5. protect the amenity of the area (existing and proposed properties), including creation of healthy active environments and residential amenity, in terms of satisfactory daylight, overbearing development, sunlight, outlook, privacy, soft landscaping as well as noise, odour and light pollution. Development near to existing sources of pollution or nuisance will not be permitted if it is likely that those existing sources of pollution will have an unacceptable impact on the proposed development. Exceptions may be permitted where the applicant submits satisfactory up to date impact assessments and proposals to substantially mitigate the effects of existing sources of pollution on the development proposals."</p>					Comments noted. It is considered that the points raised are covered in the wording of Policy SD4 (Pollution and Water Quality).	No
LPS203	Design Considerations	Policy DC 1	Mrs		This policy is central to respondent's objection to the development of Site EN128. Development will not reinforce local			No		Comments noted. This policy is used alongside others in the plan to assess the acceptability of planning applications so any	No

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			C Burton		distinctiveness or be designed in a way that respects the area. Additionally with regard to point 7, the area already has too much car usage at school times.					proposed development scheme would need to comply with this policy.	
LPS233	Design Considerations	Policy DC 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) support part 11 of this policy.					Support noted.	No
LPS226	The Historic Environment	Policy DC 2	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) welcome the additional wording that references developments affecting archaeology. Point 5 of the policy is also supported.					Comments noted.	No
LPS290	The Historic Environment	Policy DC 2	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England welcome the inclusion of 'heritage at risk' in this section of the Plan. They reference Paragraph 126 of the NPPF which makes clear that the Local Plan should aim to be proactive in planning for the maintenance and use of heritage assets. As such, this section would benefit from proactive assertions about what the Council intends to do in order to proactively address heritage at risk. Historic England note the positive work already underway in this respect as outlined in their meeting with the Council on 18/01/20198. Reference to this work could be included.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>	Historic England recommend the expansion of the wording under point 6 of this policy to include reference to the proactive approach that the Council is taking, and reflect the positive new/ongoing work by the Council in the associated text.			<p>Policy DC2 has been completely re-written since the Preferred Options Stage after extensive consultation with Historic England and the wording was agreed in January 2018. It is not considered necessary to further revise the wording.</p> <p>However, the supporting text to the policy will be amended to include details of the Council's pro-active work on heritage at risk in the District.</p>	Yes	
LPS292	The Historic Environment	Policy DC 2	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England state that it would be helpful to clarify in section 2 of this policy that this includes the consideration of harm to heritage assets, including their setting. They also suggest minor changes to the wording to make clear that the setting of undesignated heritage assets may also be considered.</p> <p>Historic England also continue to welcome additional text which</p>	Historic England suggest the replacement of point 2 with the following: "Protection will be given to both designated and non-designated heritage assets and their settings (including the consideration of harm to their significance) in line with the NPPF."				Policy DC2 has been completely re-written since the Preferred Options Stage after extensive consultation with Historic England and the wording was agreed in January 2018. It is not considered necessary to further revise the wording.	No

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					<p>adds to, rather than citing, NPPF policy as possible and appropriate.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>						
LPS325	Local Green Space	Policy DC 4	Mr Gez Willard	Willardwillard Ltd	The allocation and protection of The Rocks (25) and High Lane (26c) as the only protected open space within Brown Edge is supported.					Comment noted.	No
LPS111	Paragraph	8.99	Mrs MELANIE THOMAS		<p>Respondent draws attention to the sentence "new development can put a strain on existing facilities and disadvantage both existing and new residents in an area". The proposed development of Site EN128 would put a strain on existing facilities and result in a loss of green open space.</p> <p>Whilst the current owner of Site EN128 wishes to develop the site for financial gain, a change in ownership could offer the possibility of extending the school playing field/wildlife area, increasing the provision of recreational space in the village. The space should be preserved for the future benefit of the wider community.</p> <p>The proposed access points to Site EN128, from the corner of Brookfield Avenue/Stoney Land or via No. 14 Brookfield Avenue, are both dangerous. Residents disagree with the views of the Highways Authority on this issue. To create a mini-estate off Brookfield Avenue would exacerbate the existing traffic problems which are caused by pupils being dropped off and picked up from Endon High and St Luke's Primary School. The avenue is already blighted by heavy parking, congestion at both ends of the school day and dangerous manoeuvres by drivers. This is despite the installation of double yellow and single yellow line parking restrictions. 22 proposed properties on Site EN128 could realistically generate an additional 40 vehicles (plus visitors) per day accessing and exiting via Brookfield Avenue. This would create travel chaos and further increase the danger to schoolchildren and residents.</p>	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No	<p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made</p>	No	

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										<p>up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	
LPS157	Paragraph	8.99	Mr Kevin Thomas		<p>Respondent draws attention to the sentence "new development can put a strain on existing facilities and disadvantage both existing and new residents in an area". The proposed development of Site EN128 would put a strain on existing facilities and result in a loss of green open space.</p> <p>The proposed access points to Site EN128, from the corner of Brookfield Avenue/Stoney Lane or via No. 14 Brookfield Avenue, are both dangerous. Residents disagree with the views of the Highways Authority on this issue. To create a mini-estate off Brookfield Avenue would exacerbate the existing traffic problems which are caused by pupils being dropped off and picked up from Endon High and St Luke's Primary School. The avenue is already blighted by heavy parking, congestion at both ends of the school day and dangerous manoeuvres by drivers. This is despite the installation of double yellow and single yellow line parking restrictions. 22 proposed properties on Site EN128 could realistically generate an additional 40 vehicles (plus visitors) per day accessing and exiting via Brookfield Avenue. This would create travel chaos and further increase the danger to schoolchildren and residents.</p>	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		<p>New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.</p> <p>National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback has informed the Infrastructure Delivery Plan and the Local Plan.</p> <p>The Council has worked with Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement</p>	No

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										<p>Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p>	
LPS99	Creating Sustainable Communities	Policy C 1	NHS Property Services (NHSPS)		<p>According to the NHS Property Services (NHSPS), this policy is too restrictive in that it requires a viability appraisal to be undertaken to demonstrate that loss of a community facility would not disadvantage local residents. Restrictive policies such as this prevent the loss or change of use of 'community facilities'. Furthermore, including healthcare facilities within the definition of 'community facilities' as SMDC have done, can prevent or delay required investment into alternative facilities and work against the Council's aim of providing essential services for the community. It is important to note that there are separate, rigorous testing and approval processes employed by NHS Commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.</p> <p>Paragraph 70 of the NPPF states that planning policies and decisions should "guard against the unnecessary loss of valued facilities and services". The overarching objective of this same paragraph is to ensure the delivery of facilities and services for the community. This policy wording has also been retained in Paragraph 93(c) of the Draft NPPF consultation document (March 2018), which under Paragraph 93(b) also states that planning policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community.</p> <p>According to the NHSPS, an essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).</p> <p>Much surplus NHS property is outdated and no longer suitable for</p>	<p>3 (b) should be amended to the following (changes shown in bold): "b) a viability appraisal including a marketing exercise by a qualified professional demonstrates that there are no options for continued use as any type of community facility which are financially viable and it can be demonstrated that loss of the facility would not disadvantage local residents (unless in the context of healthcare provision, the loss of facilities arises from an NHS Service modernisation strategy).</p>	Yes	No	Yes	<ul style="list-style-type: none"> The Council has engaged with the CCG/NHS through the Local Plan process and in the preparation of the Council's Infrastructure Delivery Plan (IDP). The IDP (Feb 2018) states that CCG are in the process of developing a business case and plans to reconfigure services and infrastructure and recommends close working with the CCG to understand future plans once these have been finalised. The respondent has stated that there are separate, rigorous testing and approval processes employed by NHS Commissioners to identify unneeded and unsuitable healthcare facilities. It is considered that this information could be dealt with under Part 3 of Policy C1 which requires evidence to show that alternative facilities are available or can be provided or that the facility is unviable. Section 106/CIL funding towards the cost of delivering this infrastructure can be sought where it meets the NPPF planning obligation tests. The Infrastructure Development Plan will be updated to reflect infrastructure requirements. 	No

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					<p>modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses). These sites should not be subject to restrictive policies or periods of marketing which could delay the process of delivering the NHS estate regeneration programme and lead to an unnecessary cost to the NHS.</p> <p>Information regarding NHSPS</p> <p>NHSPS manages, maintains, and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p>When planning for new settlements, the Council should continue to work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development.</p> <p>Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The Council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable.</p> <p>Where extended or relocated health facilities are required to mitigate the impact of new development, health commissioners would require Section 106/CIL funding towards the capital cost of delivering this infrastructure. An assessment of the appropriate mechanisms for delivering the required funding will need to be undertaken at an early stage in collaboration with the Council.</p>						
LPS245	Creating Sustainable Communities	Policy C 1	Mr Tom Clarke	National Planning Adviser Theatres Trust	The Theatres Trust welcomes the Plan's support for and protection of community and cultural facilities including theatres, as articulated through this policy.		Yes	Yes	Yes	Support noted.	No
LPS112	Paragraph	8.105	Mrs MELANIE THOMAS		Developing 22 homes on Site EN128 would bring more children to the village of Endon, placing unacceptable demands on both primary and secondary schools in the area that are already oversubscribed. The development of Site EN128 would increase the need for school places which would require school extensions. This is at the same time as having a detrimental impact on the wellbeing of pupils at St Luke's Primary School. A school extension would result in a reduction in outdoor playing space.	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		Education contributions may be required to fund additional school places to mitigate the impact of development, however schools should be left with sufficient playing fields to deliver curricular and extra-curricular needs. A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the	No

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										periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.	
LPS158	Paragraph	8.105	Mr Kevin Thomas		Developing 22 homes on Site EN128 would bring more children to the village of Endon, placing unacceptable demands on both primary and secondary schools in the area that are already oversubscribed. The development of Site EN128 would increase the need for school places which would require school extensions. This is at the same time as having a detrimental impact on the wellbeing of pupils at St Luke's Primary School. A school extension would result in a reduction in outdoor playing space.	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		Education contributions may be required to fund additional school places to mitigate the impact of development, however schools should be left with sufficient playing fields to deliver curricular and extra-curricular needs. A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.	No
LPS214	Sport, Recreation and Open Space	Policy C 2	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) are 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. Of course this is subject to an agreed strategy being devised between the relevant parties (SCC, SMDC and Sport England). SCC would expect the strategy to thereafter be delivered via SMDC utilising enhanced sports and leisure contributions collected from housing development and/or CIL. This is a matter that could be addressed in a Statement of Common Ground (SOCG) to support the Plan. The reason for the above amendment is that Paragraph 8.105 of the Plan states that where losses of school playing fields are the result of expansion to support housing growth, that housing development should be responsible for the mitigation, which SCC support this. However, the paragraph goes on to suggest that these should be dealt with on a site by site basis. Policy C2 then sets out that open space including all school playing fields, will be protected from development unless one of three criteria can be met.					A District-wide Action Plan will be prepared which will take into account potential losses of school playing fields due to the expansion of schools arising from proposed housing growth. This will be in agreement with Sport England and will ensure that suitable alternative provision is made in line with Policy C2 part 1 a). A Statement of Common Ground between SCC and SMDC will include reference to this. Agree that some additional text can be added to the supporting text of Policy C2 to clarify this: 8.105 It is acknowledged that due to housing growth and increasing population, some schools may be required to expand, potentially onto playing pitch land. Where this is the case, it is imperative that the schools in question are left with sufficient playing field and playing pitch land to deliver curricular and extra-curricular needs <u>as well as any community use arrangements</u> . The Playing Pitch Strategy (2017) advises that if the schools curricular and extra-curricular needs can continue to be met despite the expansion, mitigation for the loss of the playing pitch land is still required, given the shortfalls identified. <u>Replacement of school playing field, including costs and new</u>	Yes

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										<p><u>provision that is lost as a result of school expansion should be borne by the developers, from those developments directly linked to school expansion. Where developers are required to make education based contributions (for school places), those developers may also be required to make additional financial contributions through section 106 agreements to mitigate for the for future loss of school playing fields impacted by school those school expansions.</u></p> <p><u>Where part of a playing pitch is lost from school expansion, it may be the case that the requirement for replacement provision will be greater than the equivalent land lost and equal to that of the whole playing pitch that has been impacted by the development. This is to say that the loss of part of a playing pitch may render the whole pitch area as having being "lost" to its playing purpose and a requirement for equal replacement of that pitch may be required under the advice of the 2017 Playing Pitch Strategy. These potential losses will be considered in the round so that they can be dealt with on a strategic basis as part of the Council's District-wide Action Plan.</u></p> <p><u>Where like for like replacement of school playing field or playing pitches as a result of development is not practicable, financial contributions may be sought for alternative sport and recreation provision.</u> This should therefore be covered via developer contributions from the housing allocations, with a mitigation package agreed upon by all stakeholders, including Sport England. on a site by site and development by development basis. The Council's Playing Pitch Strategy action plans and Strategy for Physical Activity and Sport will take into account these potential losses as part of its District-wide Action Plan.</p>	
LPS113	Paragraph	8.107	Mrs MELANIE THOMAS		<p>Retaining Site EN128 as a green open space would be in accordance with this paragraph.</p> <p>Development of Site EN128 will create noise/light pollution and could have an adverse effect on Green Infrastructure. Pupils of St Luke's Primary School have been adversely impacted in recent years by the increase in traffic on the adjacent and very busy A53. Retaining Site EN128 as a green open space would protect the semi-rural nature of the area, benefiting the pupils of St Luke's.</p>	<p>Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.</p>		No		<p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green</p>	No

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										Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.	
LPS159	Paragraph	8.107	Mr Kevin Thomas		Retaining Site EN128 as a green open space would be in accordance with this paragraph. Development of Site EN128 will create noise/light pollution and could have an adverse effect on Green Infrastructure. Pupils of St Luke's Primary School have been adversely impacted in recent years by the increase in traffic on the adjacent and very busy A53. Retaining Site EN128 as a green open space would protect the semi-rural nature of the area, benefiting the pupils of St Luke's.	Site EN128 should be removed from the Plan and alternatives proposed by the Parish Council considered, such as smaller infill sites spread throughout the village.		No		The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS. The site is within the village boundary and is therefore considered suitable as a potential housing option. Issues such as external lighting in schemes can be controlled by the Council's amenity policies. Streetlighting is a matter controlled by SCC Highways. Note that external lighting (where not separately controlled by planning conditions) should be considered under statutory nuisance legislation. The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good. A number of the sites suggested by the Parish Council were either too small to be included as allocation options, or were initially suggested in the SHLAA but were considered unsuitable for the 2015 consultation. Also note that sites suggested on the periphery of Endon fall (as opposed to EN128) within Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Consideration needs to be given to all the relevant evidence to determine the overall suitability of the site for release from the Green Belt. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.	No
LPS91	Biodiversity and Geological	Policy NE	Roslyn	Natural	Natural England welcomes the additions to this policy concerning		Yes	Yes	Yes	Comments noted.	No

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	Resources	1	Deeming (Natural England)	England	the avoidance-mitigation-compensation hierarchy. They now consider the policy to be more closely aligned to the guidance set out in Paragraph 118 of the NPPF.						
LPS177	Biodiversity and Geological Resources	Policy NE 1	Angela Turner		All sites identified as being of ecological importance must be enhanced through developments where possible. Hedgerow, bat and reptile surveys need to be carried out where identified in evidence base assessments. Ponds are rare in this parish and as such, should be retained and enhanced for their wildlife value, as well as their public benefit.					According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence: all proposed allocations were subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence; further Policy NE1 allows for the Council to require ecological mitigatory or compensatory measures where appropriate, and part (7) expects the protection and enhancement of habitats and species of principal importance. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites.	No
LPS225	Biodiversity and Geological Resources	Policy NE 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Part 1 of this policy should, for accuracy and legal compliance, refer to sites of International rather than European significance, as Ramsar sites are included in Habitats Regulations requirements and these are International sites. While there may currently be no Ramsar sites within Staffordshire Moorlands, this may change and there could be potential for impact on cross-boundary sites.				No	Agreed that amendment as proposed would provide greater accuracy.	Yes
LPS178	Paragraph	8.128		Highways England	Highways England (HE) have reviewed the Local Plan 'Submission Version' document and welcome that all their comments, in respect to the 'Preferred Options' consultation, have been addressed. Highways England note that SMDC have made particular reference to the A50/A521 junction with the inclusion of a statement in the Local Plan indicating that an assessment of the A50/A521 junction will be undertaken once further local plan information is obtained from neighbouring authorities. Highways England wishes to continue working with SMDC and Staffordshire Council, as the Local Highway Authority, to consider the traffic implications of identified sites within the A50 corridor in order to confirm any mitigation measures at the A50/A521 junction that may be required to support delivery of the Local Plan.					Support noted. The Council will continue working closely with Highways England as part of the Duty to Cooperate.	No
LPS105	Development and Sustainable Transport	Policy T 1	Mr T A J Campbell		Respondent support most of Policy T1 but raises concerns with the requirement that "development which generates significant demand for travel or is likely to have significant transport implications (as identified within a Transport Assessment) will, where appropriate contribute to improved public transport provision (and) contribute to junction improvements, traffic management and highway infrastructure." Respondent states that this is imprecise and contrary to government guidance in Paragraph 204 of the NPPF which states that 106 obligations that	Reword Policy T1 paragraph 2 to say "development which generates significant demand for travel or is likely to have significant transport implications (as identified within a Transport Assessment) will, where appropriate contribute to	Yes	No	Yes	No further amendments to the Policy wording are considered necessary, so as to maintain consistency across policies set out in the Local Plan, and to avoid tautological references. Schemes would also be assessed against Policy SS12 which goes into greater detail about planning contributions, and NPPF.	No

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					would be necessary to implement this policy. That makes it clear that such contributions should be directly related to the development and be fairly and reasonably related in scale and kind to the development.	improved public transport provision and to junction improvements, traffic management and highway infrastructure directly related to the development and to the extent that it is fairly and reasonably related to the development." This wording should also be introduced into Policy DSC3, where it talks about contributions being required.					
LPS221	Development and Sustainable Transport	Policy T 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) are generally supportive of this policy.					Comments noted.	No
LPS11	Other Sustainable Transport Measures	Policy T 2	Mr Paul Bain		<p>Additional information added to this representation was received on 1st April 2018.</p> <p>Respondent objects due to the lack of adequate footpaths in Staffordshire Moorlands (with specific reference to the village of Alton) and the lack of studies into the shortcomings of existing pedestrian footpaths and the future provision of footpaths. The respondent is concerned that the lack of adequate footpaths could result in serious pedestrian injury and suggests that footpath risk assessments (like flood risk assessments) should be undertaken.</p> <p>The respondent makes reference to four examples in the village of Alton where there is a lack of adequate footpath (see below). They have only considered those areas which are local to them but others may exist. It is for the Council to provide evidence that such footpath risk assessments exist with appropriate controls. These footpath risk assessments should form part of Local Development Scheme documents and "future arrangements".</p> <ul style="list-style-type: none"> Location 1: Lack of adequate footpath connecting the residents of Slatersford Lane and the two storey housing fronting Denstone Lane. Location 2: Lack of adequate footpath connecting the recently completed executive housing at Alverton Court with Alton Village. Location 3: Lack of adequate footpath serving Tythebarn B&B, Fox House and Alton. Location 4: Lack of adequate footpath serving residents on Nabb Lane, namely Nabb Cottage, Ashcroft and 	<p>With regard to the lack of adequate footpaths in Alton, respondent suggests the following modifications:</p> <ul style="list-style-type: none"> Location 1: The existing footpath which terminates on Slatersford Lane should be continued, and connect with the Uttoxeter Road footpath. Location 2: Provide a footpath that connects the executive housing at Alverton Court to Alton. Location 3: Provide a footpath directly outside the exit/entrance gate to Tythebarn B&B, as part of a mini roundabout calming measure at the '5 Ends' intersection. A footpath should also be provided for Fox House, as 	No	No	No	<p>Councils are under obligation to prepare and update Local Plans for their areas; and as a policy requirement to demonstrate how their Plans meet their objectively assessed needs for future housing and other forms of development. Plans should be based on proportionate and relevant evidence base concerning the environmental etc characteristics of their area. Policies should cover future transport infrastructure requirements, and Plans should avoid significant adverse environmental impacts. The Council's website sets out a number of development capacity and transportation studies, and infrastructure delivery plan, which have been taken into account in the preparation of the submission Local Plan. Note that Local Plan Policies and objectives seek to direct more sustainable patterns of travel such as walking and cycling over car use.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC have not objected to the allocations contained in the submission Local Plan (including Alton AL012), recommending in some cases that transport assessments be submitted with future schemes at some sites; and planning contributions may be required in some cases. The Council's own Policy T1 Development and Sustainable Transport sets out the circumstances where developers must contribute to eg improved highways infrastructure. The Government's National Planning Policy Framework however explains that schemes should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</p> <p>Note that footpath and highways maintenance remains a duty of the County Council, not Staffordshire Moorlands District Council. SCC's local priorities with regards highways works are set out in its Integrated Transport Strategy for the Staffordshire</p>	No

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					<p>Rosehill ('The Triangle') to Alton Village.</p> <p>Respondents highlights the following issues with regard to Location 1:</p> <ul style="list-style-type: none"> The footpath that runs west towards Uttoxeter Road from Denstone Lane, and terminates on Slatersford Lane some 75 metres before Uttoxeter Road forces pedestrians onto a reduced width of road because of the presence of parked cars. There is no footpath on either side of Slatersford Lane, or to the footpath on Uttoxeter Road and the bus stop. Residents of the two storey housing fronting Denstone Lane have constructed a makeshift stairway onto Denstone Lane. Serious risk of fatality. <p>Respondents highlights the following issue with regard to Location 2:</p> <ul style="list-style-type: none"> Same problem as Location 1 in that the footpath discontinues on Slatersford Lane. There is no footpath connection from Slatersford Lane to Uttoxeter Road and to local amenities. <p>Respondents highlights the following issue with regard to Location 3:</p> <ul style="list-style-type: none"> Residents exiting the B&B through the gate shown in IMG 1577 exit directly onto the road and oncoming high speed traffic. <p>Respondents highlights the following issues with regard to Location 4:</p> <ul style="list-style-type: none"> The exit/entry points for Nabb Cottage, Ash Croft and Rosehill drop directly onto Nabb Lane. There is no footpath on either side of the lane. All three properties (Nabb Cottage, Ash Croft and Rosehill) are isolated from Alton Village, requiring pedestrians to walk along Nabb Lane and cross Denstone Lane and Saltersford Lane in order to gain access to the footpath on Uttoxeter Road (as well as the bus stop and village amenities). Both Denstone Lane and Saltersford Lane are busy. The alternative pedestrian route for those exiting the aforementioned properties is to use a makeshift stone step located on Nabb Lane opposite the entrance to Nabb Cottage. This step provides access into the Blacksmith Arms car park. It is then possible to cross the car park albeit illegally through private ground, to the existing footpath on Cheadle Road. Crossing Cheadle Road to Uttoxeter Road and access to the bus stop, GP surgery and community hall is dangerous. There is no 	<p>part of this road traffic calming measure.</p> <ul style="list-style-type: none"> Location 4: Extend the existing footpath east (down Denstone Lane using the grass verge to the junction with Nabb Lane), on Cheadle Road. <p>Respondent also suggests that footpath risk assessments (like flood risk assessments) should be undertaken.</p>				Moorlands.	

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					<p>pedestrian footpath along the front of Fox House or around the right-hand gable to Uttoxeter Road. Pedestrians must check for traffic continually in all '5 Ends'.</p> <p>Respondent also states that the Council has not met its obligation with respect to its 'duty of care' in identifying the safety risk assessment of existing and future footpaths, as a strategic objective and developing appropriate 'outcomes' and 'future' arrangements'.</p>						
LPS12	Other Sustainable Transport Measures	Policy T 2	Mr Paul Bain		<p>Additional information added to this representation was received on 1st April 2018.</p> <p>Respondent objects due to the high risk of fatal accident involving pedestrians and vehicles at the junction between Cheadle Road, Uttoxeter Road, Slatersford Lane, Denstone Lane and Nabb Lane (known locally as '5 Ends').</p> <p>This junction is high risk due to the following:</p> <ul style="list-style-type: none"> Through traffic from Cheadle travels at a high speed into the blind bend, whilst traffic from Denstone travels up a hill around the blind bend towards the junction. There is no safe pedestrian route through the junction, connecting the existing Cheadle Road footpath to the Uttoxeter Road footpath. The exit/entry point to Tythebarn B&B and Fox House drops directly onto the junction. The footpath on the north side of Cheadle Road terminates before the junction with no footpath adjacent to the Fox House building line, forcing pedestrians to walk along the road or cross Cheadle Road to the footpath on the south side. The Alton Towers traffic entering Uttoxeter Road from Denstone Lane during peak times creates an additional risk of accident/injury. Traffic jams created by Alton Towers causes people to become frustrated, resulting in accelerated behaviour through the junction. <p>Respondent also states that the Council has not met its obligation with respect to its 'duty of care' in identifying the safety risk assessment of dangerous road junctions, as a strategic objective and developing appropriate 'outcomes' and 'future' arrangements'.</p>	<p>Respondent suggests the following:</p> <ul style="list-style-type: none"> Introduce a mini roundabout to the junction, which would create 'give ways' at the Cheadle and Denstone Lane ends of the junction. This would slow traffic down and provide an opportunity to construct a footpath crossing point between Nabb Lane and Tynebarn B&B to Uttoxeter Road (across Slatersford Lane). Respondent has drawn a sketch to illustrate this (Sketch 10 – '5 Ends Layout Proposed') Introduce traffic lights. This would allow pedestrian's right of way, particularly during peak times. It would also have the benefit of controlling single lane traffic entering/exiting Slatersford Lane, facilitating the section of missing footpath to be constructed. 	No	No	No	<p>Councils are under obligation to prepare and update Local Plans for their areas; and as a policy requirement to demonstrate how their Plans meet their objectively assessed needs for future housing and other forms of development. Plans should be based on proportionate and relevant evidence base concerning the environmental etc characteristics of their area. Policies should cover future transport infrastructure requirements, and Plans should avoid significant adverse environmental impacts. The Council's website sets out a number of development capacity and transportation studies, and infrastructure delivery plan, which have been taken into account in the preparation of the submission Local Plan. Note that Local Plan Policies and objectives seek to direct more sustainable patterns of travel such as walking and cycling over car use.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC have not objected to the allocations contained in the submission Local Plan (including Alton AL012), recommending in some cases that transport assessments be submitted with future schemes at some sites; and planning contributions may be required in some cases. The Council's own Policy T1 Development and Sustainable Transport sets out the circumstances where developers must contribute to eg improved highways infrastructure. The Government's National Planning Policy Framework however explains that schemes should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</p> <p>Note that footpath and highways maintenance remains a duty of the County Council, not Staffordshire Moorlands District Council. SCC's local priorities with regards highways works are set out in its Integrated Transport Strategy for the Staffordshire Moorlands.</p>	No

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LPS223	Other Sustainable Transport Measures	Policy T 2	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) are generally supportive of this policy, particularly part 4.					Comments noted.	No
LPS293	Strategic Development Site Policies	9	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Many of the site allocation policies and associated text in this section of the Plan could be improved with respect to recognising and appropriately mitigating impact on the historic environment in line with the NPPF. Historic England advise the following are considered and acted upon moving forward:</p> <ul style="list-style-type: none"> Ensuring that heritage impacts (including those as a result of setting and on non-designated heritage assets) identified in the Evidence Base are clearly stated within the associated text to the policies. Historic environment mitigation should be given its own bullet point, and not subsumed within references to 'landscaping plans'. Historic environment policies could make reference to the need for development to be in line with the Historic Environment Character Assessment as well as the 'Landscape, Local Green Space and Heritage Impact Study' as this provides additional relevant information and recommendations which will both help clarify the nature of appropriate development and better conserve heritage assets. It would also be advisable to state that further mitigation may be required following the findings of any Heritage Assessment for a particular proposal. Mitigation measures identified within the policies should make clear that screening is not the only mitigation measure which may be appropriate - e.g. reduced density, open space, design, heights and other considerations may also need to be considered. Such clarity would be particularly helpful given the relative lack of detailed mitigation measures for the historic environment identified for individual sites. <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>				<p>The policies were amended to state heritage impacts within them as a result of comments made by Historic England at Preferred Options Stage.</p> <p>Historic Environment mitigation (where relevant) does have its own bullet point (e.g. Policy DSB1).</p> <p>The Historic Environment Character Assessment fed into the Council's Landscape, Local Green Space and Heritage Impact Study and is referenced in paragraph 8.86 of the plan (the supporting text to the Historic Environment Policy). Paragraph 8.90 explains in detail what the Council expects to see in a heritage statement including any mitigation / enhancement measures which may be appropriate.</p>	No	
LPS444	Strategic Development Site Policies	9	Richard	Gladman	Gladman reference extracts from the Inspector's report on the Telford & Wrekin Local Plan Examination which was published in	The Plan should be supported by a clear audit	Yes	No	Yes	The Council maintains a housing suggestions database (Strategic Housing Land Availability Assessment or 'SHLAA'); which formed	No

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			House		<p>November 2017. In Paragraph 117 the Inspector makes reference to the requirements of a site selection process. Throughout the report, the Inspector also raises several specific concerns regarding the site selection process that the Council had undertaken. In Paragraph 183 they state: "Drawing these matter together, I consider that the housing site selection exercise underpinning the Local Plan is flawed". Given this conclusion, the Inspector recommended the deletion of all the proposed housing allocations in the Plan that had been identified through the site selection process but did not already have planning permission or other consent.</p> <p>In respect of the Staffordshire Moorlands Local Plan, Gladman has not been able to ascertain the site selection process undertaken by the Council and consequently it is not possible to identify the planning judgements exercised by the Council in allocating sites in the Local Plan. It considers, therefore, that the Local Plan cannot be considered to be sound until full details of this process have been made available for scrutiny.</p>	trail of the site selection process utilised by the Council for the Local Plan.				<p>the basis of the Council's 2015 Site Options public consultation. This mapped all housing sites on the database that were deemed broadly suitable and in the case of villages had a housing capacity of 5+ dwellings. This and later consultations also invited alternative suggestions for housing sites. The options sites assessments following the '2015 Options' public consultation provided a broadbrush red/amber/green comparison between the various options sites; and was used to assist the Council in arriving at the 2016 'Preferred Options'. The 2016 Preferred Options formed the basis of the 2017 Preferred Options Local Plan. The Council has considered the alternative sites suggested in the responses to previous consultations and where appropriate has included the additional sites in the proposed site allocations in the emerging Local Plan. The Council publishes its responses to representations received at each round of public consultation on its website.</p>	
LPS215	Land at Horsecroft Farm, Leek	Policy DSL 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) support this policy. This is because the policy makes provision for land for a school expansion and in doing so requires the realignment of the track running through the site to ensure that the expanded school can be contained within a single site. Given the spatial distribution of housing growth and the location of the two middle schools, Churnet View is deemed the best option to provide the necessary places. In order to provide the additional places though, the school will require further land and Horsecroft Farm provides the only opportunity to do so.					Support noted.	No
LPS354	Land at Horsecroft Farm, Leek	Policy DSL 1	Mr Martin Webb		Respondent questions the deliverability of this site. It is not clear whether it is viable to deliver the proposed education requirements on the basis of the draft allocation. Additionally, Paragraph 9.6 of the Plan acknowledges that there may be constraints due to possible ground gas from nearby landfill. This could further impact upon viability.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>With regards allocation DSL1 (Land at Horsecroft Farm Leek) the Plan states that investigation is required in relation to ground contamination but this is not considered to affect the delivery of the site.</p> <p>The Council's Viability Study shows that the site is viable (including taking into account educational and other contributions).</p> <p>The NPPF states Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No

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LPS401	Land at Horsecroft Farm, Leek	Policy DSL 1	Wainhomes (North West) Limited		Respondent questions the deliverability of this site. It is not clear whether it is viable to deliver the proposed education requirements on the basis of the draft allocation. Additionally, Paragraph 9.6 of the Plan acknowledges that there may be constraints due to possible ground gas from nearby landfill. This could further impact upon viability.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>With regards allocation DSL1 (Land at Horsecroft Farm Leek) the Plan states that investigation is required in relation to ground contamination but this is not considered to affect the delivery of the site.</p> <p>The Council's Viability Study shows that the site is viable (including taking into account educational and other contributions).</p> <p>The NPPF states Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS37	Paragraph	9.14	Andy McGraw		The site supports Red Data Book species, not just bats. A surveys needs to take into account all species throughout the year for this site to be sound.		No	No		<p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. The Mount sites LE022/ LE066/ LE128/ LE140/ LE142A/ LE142B were all subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p>	No
LPS38	Paragraph	9.15	Andy McGraw		Developers must be forced to provide social housing, even though it will result in a reduction in profits.		No	No		<p>The Moorlands suffers from a shortage of affordable housing; and Local Plan Policy H3 requires that at least 33% of housing on new housing sites be affordable (and a proportion of these be dedicated as starter homes) unless developer viability demonstrates this to not be possible. In addition Policy H1 also sets out the Council's expectations concerning self-build/custombuild housing on new housing sites. Policy SS12</p>	No

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										sets out Council expectations upon developers with regards financial planning contributions, and Community Infrastructure Levy.	
LPS19	Land at The Mount, Leek	Policy DSL 2	Mr John Pigott		<p>The respondent considers the Plan unsound because no assessment of the value of The Mount as a recreational utility has been made.</p> <p>According to the respondent, the proposal to build in LE066, LE128 and LE140 is unacceptable because The Mount is an important open space close to the town centre, and a popular route for walking, jogging and cycling. It is an important local amenity which has been underestimated, and its value not understood or considered by SMDC planners.</p> <p>A local resident carried out a survey on Sunday 8th May 2016 between 0700 and 2000 on the number of people using The Mount. According to the survey 217 people were using the road for recreation: 190 walkers (44 with dogs and 8 with prams), 12 cyclists, 12 joggers and 3 horse riders. A similar survey was conducted on Thursday 7th September 2017, which showed 163 persons using the road for recreational purposes despite afternoon showers.</p> <p>On Monday 19th March 2018 when there was a significant amount of snow lying on the ground, a large number of people were walking along Mount Road, enjoying the views and tranquillity of the area.</p> <p>If development goes ahead, Mount Road, which is now a country lane and footpath, will be widened and become a busy estate road and bypass between Ashbourne Road and Buxton Road. People would no longer use it for recreational purposes. Furthermore, what has been a popular walk for generations would be gone for ever. There are more sustainable alternative sites on the western side of Leek, which could be developed (including the land at Home Farm and Foker Grange on Macclesfield Road). Unlike The Mount, these two sites do not have high public amenity and would provide balance to the future development of the town.</p> <p>In summary, the respondent feels that the recreational use of The Mount has been ignored, as have the comments made by the hundreds of people who use The Mount regularly for walking and other recreational purposes.</p> <p>The respondent has also made comments on the following:</p> <ul style="list-style-type: none"> Paragraph 8.5: Whilst several brownfield sites within Leek have been considered or are subject of a planning approval, no mention has been made of the old Fowlchurch landfill site which was completed at least 15 years ago. Landfills can be used for development after an appropriate time. Policy SS3, Table 7.1: Respondent queries the allocation 		No	No	<p>The public open spaces / Local Green Spaces proposed by the Council are those mapped in the Submission version Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>The Council uses evidence to justify its selection of submission Local Plan sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council selects submission Local Plan sites.</p> <p>Mount Road is a vehicular highway. The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022 /LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate). Leek is already served by a number of frequent or less frequent bus routes, connecting to centres such as Hanley, Cheadle, Buxton and Macclesfield. A number of these use main arterial routes such as Buxton Road/Ashbourne/Springfield Road. In some circumstances, major residential developments may be required to contribute to improved bus routes/bus facilities in accordance with Local Plan Pol T1/SM Integrated Transport Strategy.</p> <p>The submission Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from</p>	No	

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					<p>of housing development between the three towns and the Rural Areas. Apart from Blythe Vale with 300 houses, there are only 5 other sites in the Rural Area allocated for major development. There are none for instance, in the larger villages of Cheddleton and Ipstones. The Mount should not be developed.</p> <ul style="list-style-type: none"> • Policy H2: Considering the areas for significant development in Leek, respondent does not feel sufficient thought has been given to new housing along the western entrance to the town, on Macclesfield Road. Assuming that many of the new houses will be for commuters working in the Macclesfield/Stockport/Manchester area it would seem sensible to have some development along the Macclesfield Road. Site LE138 should be considered for development. • Policy SS5: The Plan seems to have ignored this policy, particularly bullets 4 and 6. No assessment or comment has been made about the amenity value of The Mount in terms of the number of people who walk or jog around it. The amenity would be lost if development goes ahead. • Policy DSL2: The development of LE128, LE140 and LE066 is unacceptable because The Mount is an important recreational amenity, close to the town centre. A survey carried out by a local resident on Sunday 8th May 2016 between 0700 and 2000 counted a total of 217 people using the road for recreation: 190 walkers (44 with dogs, 8 with prams), 12 cyclists, 12 joggers and 3 horse riders. A similar survey undertaken on 7th September 2017 showed 163 people using the road for recreation, even though it was raining (see attached table). If development did proceed, Mount Road would become a busy estate road and bypass between Ashbourne and Buxton Road. People would not use it for recreation. There are more suitable alternative sites available, on the western side of Leek which could be developed, including land at Home Farm and Foker Grange. 					land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.	
LPS39	Land at The Mount, Leek	Policy DSL 2	Andy McGraw		<p>The policy cannot be sound when the town boundary has been moved without consultation. Other sites that are not so important to the people of Leek need to be considered. The Mount is an open space used daily by people walking, running, cycling and riding horses. The Mount deserves the same protection as the Green Belt. It is a very important amenity for people who live on the east side of Leek, and it has positive effects on their well-being. Lastly, moving the town boundary means that the town is encroaching every closer to the Peak District National Park.</p>		No	No	No	<p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. These are matters covered by the Government's soundness tests which will be considered at examination by Government Inspector. All stages of the proposed Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p> <p>Residents views have been sought as part of various public consultations. The Council must balance this evidence against all the other evidence relating to proposed sites and reach a decision on which sites to include as development sites in the</p>	No

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										<p>Local Plan.</p> <p>The Council informed residents about the various local plan consultations in a number of ways - site notices, a flyer through the door of all residents and businesses, further notification for those on the local plan database (postcard or email), posters for town council to display, drop in event, press releases.</p> <p>The Council uses evidence to justify its selection of submission Local Plan sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council selects submission Local Plan sites.</p> <p>Some of the sites suggested lie in the Green Belt. The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The Green Belt Review Study provides a strategic review of Green Belt purposes and a more detailed site-based assessment of land which could be considered for review. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in the emerging Local Plan. Planning applications arising within the Green Belt would continue to be assessed against para 89 NPPF etc.</p> <p>The public open spaces / Local Green Spaces proposed by the Council are those mapped in the Submission version Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces. New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>The submission Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting</p>	

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										in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.	
LPS227	Land at The Mount, Leek	Policy DSL 2	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) support the requirement for the provision of land for a new first School. Additionally, the reference in this policy to the need for the submission of a landscape and visual impact assessment and mitigation is appropriate, and supported by SCC.					Comments noted.	No
LPS269	Land at The Mount, Leek	Policy DSL 2	Ollerton Estates LLP and Staffordshire County Council (SCC)		<p>The landowners fully support the identification of LE066, LE128a&b and LE140 as part of Policy DSL2 and welcome the increased indicative capacity of the sites from 317 to 345 dwellings. They do, however, suggest the following changes (shown in bold):</p> <p>"Land amounting to approximately 10.62ha as shown on the proposals map is allocated for housing (at least 345 dwellings); and 0.76 ha for D1 education.</p> <p>Development must:</p> <ul style="list-style-type: none"> provide a landscaping plan including submission of landscape and visual impact assessments and mitigation of heritage impact to address recommendations set out in the Council's Landscape, Local Green Space and Heritage Impact Study; make appropriate contributions towards infrastructure proportionate with the scale of development proposed; be supported by surveys and actions recommended by the Extended Phase 1 Habitat Survey and Local Wildlife Assessment and include measures for protection and enhancement of site biodiversity and protection of any geodiversity as appropriate; address priorities and actions identified in the Council's Green Infrastructure Strategy as appropriate; and provide affordable housing in accordance with Policy H3. <p>Land for a new first school shall be safeguarded as identified on the proposals map, or similar location, if forming part of a mixed education and residential development.</p> <p>Development proposals on the allocations listed above, shall be expected to contribute to highway or junction improvements in this area, as deemed necessary to enable the development of that allocation to come forward according to the County Highways Authority, in order to coordinate contributions from</p>			Yes		<p>Support [and later development statement] noted.</p> <p>No further amendments to the Policy wording are considered necessary, so as to maintain consistency across site-specific set out in the Local Plan, and to avoid tautological references. Whilst the Council must demonstrate that its suite of proposed allocations contribute (along with windfall sites) to at least achieving its residential OAN, it is important that subsequent schemes conform to the Council's wider design, landscape and density policies etc as set out elsewhere in the Local Plan. Applying the term "at least" would place an unfair expectation that the reasonable yields assumed across the Mount, must be exceeded.</p> <p>Policy SS12 provides greater detail on developer obligations concerning planning contributions.</p>	No

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					wider developments along Mount Road.”						
LPS355	Land at The Mount, Leek	Policy DSL 2	Mr Martin Webb		Respondent questions the deliverability of this large site, noting its multiple ownerships. There are complex Section 106 contributions which will need to be agreed between the Council and all of the landowners. Additionally, the proposed quantum of development is unrealistic having regard to the application of a realistic lead-in time and build rate.		No		No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Policy SS12 sets out the Council’s expectations concerning securing contributions from development sites, including sites in multiple ownership. A Developer Contributions SPD will provide detail of how contributions will be calculated. The Plan encourages applicants on multiple ownership sites to work with the Council and other landowners on joint funding arrangements to coordinate contributions; and to enter into Land Equalisation Agreements to ensure equitable distribution of benefits.</p> <p>Note that whilst allocation DSL2 (Land at The Mount Leek) has multiple owners, two of its sites are County Council-owned (who have confirmed their support for development).</p> <p>The Council’s Viability Study shows that the site is viable.</p> <p>The NPPF states Councils should be able to demonstrate 5 years’ worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council’s Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS399	Land at The Mount, Leek	Policy DSL 2	Wainhomes (North West) Limited		Respondent questions the deliverability of this large site, noting its multiple ownerships. There are complex Section 106 contributions which will need to be agreed between the Council and all of the landowners. Additionally, the proposed quantum of development is unrealistic having regard to the application of a realistic lead-in time and build rate.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Policy SS12 sets out the Council’s expectations concerning securing contributions from development sites, including sites in multiple ownership. A Developer Contributions SPD will provide detail of how contributions will be calculated. The Plan encourages applicants on multiple ownership sites to work with the Council and other landowners on joint funding arrangements to coordinate contributions; and to enter into Land Equalisation Agreements to ensure equitable distribution of benefits.</p> <p>Note that whilst allocation DSL2 (Land at The Mount Leek) has multiple owners, two of its sites are County Council-owned (who have confirmed their support for development).</p>	No

ID	Title	Number	Full Name	Organisation Details	Summary of representation	Summary of modification	Complies with the Duty to Co-operate?	Sound?	Legally compliant?	Officer response	Modification recommended by officer
										<p>The Council's Viability Study shows that the site is viable.</p> <p>The NPPF states Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	
LPS356	Land at Newton House, Leek	Policy DSL 3	Mr Martin Webb		Respondent questions the deliverability of this site. They note it is a brownfield site which will require remediation. The Council is proposing a mixed use development including 1.5ha of employment land, which will presumably need to be cross-subsidised by the residential development. There is insufficient evidence to demonstrate that the site can be viably delivered as anticipated in the current Local Plan allocation.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>The Council is not aware of contamination issues affecting this site. In any event all proposals would need to conform to Council pollution policy SD4 (and relevant NPPF policy).</p> <p>The agent representing the landowner of this site has submitted a development statement which they argue demonstrates the quantum of housing and employment uses proposed in the policy can be accommodated on the site, based on an assessment of existing site capacity and a commercial assessment of market demand. The Council's Viability Study shows that the site is viable.</p> <p>The NPPF states Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS406	Land at Newton House, Leek	Policy DSL 3	Wainhomes (North West) Limited		Respondent questions deliverability of site. Respondent notes it is a brownfield site which will require remediation. The Council is proposing a mixed use development including 1.5ha of employment land, which will presumably need to be cross-subsidised by the residential development. There is insufficient evidence to demonstrate that the site can be viably delivered as anticipated in the current Local Plan allocation.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>The Council is not aware of contamination issues affecting this site. In any event all proposals would need to conform to Council pollution policy SD4 (and relevant NPPF policy).</p> <p>The agent representing the landowner of this site has submitted a development statement which they argue demonstrates the quantum of housing and employment uses proposed in the</p>	No

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										<p>policy can be accommodated on the site, based on an assessment of existing site capacity and a commercial assessment of market demand. The Council's Viability Study shows that the site is viable.</p> <p>The NPPF states Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	
LPS357	Cornhill East, Leek	Policy DSL 4	Mr Martin Webb		<p>Respondent questions the deliverability of this site. The site has been proposed for development for some time, including through Policy SS3 of the adopted Core Strategy and Churnet Valley Masterplan (2014). The respondent is unaware of any planning application in that time. Planning permission has been granted on land to the west of the railway, which includes the reservation of land for a link road across the railway, which could serve this site. However the costs associated with such infrastructure would be substantial. The Council has confirmed that access must not be taken via Sandon Street, which effectively means that third party land is required for access, plus the significant costs associated with such works. There is insufficient evidence to demonstrate that the site is viable for the proposed uses, including employment land, and the access requirements.</p>			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Policy SS12 sets out the Council's expectations concerning securing contributions from development sites, including sites in multiple ownership. A Developer Contributions SPD will provide detail of how contributions will be calculated. The Plan encourages applicants on multiple ownership sites to work with the Council and other landowners on joint funding arrangements to coordinate contributions; and to enter into Land Equalisation Agreements to ensure equitable distribution of benefits.</p> <p>Note that whilst allocation DSL4 Cornhill East Leek has multiple owners, the majority of the site is owned by the District Council.</p> <p>The Council's Viability Study shows that the site is viable (including taking account of access construction costs).</p> <p>The NPPF states Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS407	Cornhill East, Leek	Policy DSL 4	Wainhomes (North West) Limited		<p>Respondent questions the deliverability of this site. The site has been proposed for development for some time, including through Policy SS3 of the adopted Core Strategy and Churnet Valley Masterplan (2014). The respondent is unaware of any planning</p>			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p>	No

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					<p>application in that time. Planning permission has been granted on land to the west of the railway, which includes the reservation of land for a link road across the railway, which could serve this site. However the costs associated with such infrastructure would be substantial. The Council has confirmed that access must not be taken via Sandon Street, which effectively means that third party land is required for access, plus the significant costs associated with such works. There is insufficient evidence to demonstrate that the site is viable for the proposed uses, including employment land, and the access requirements.</p>					<p>Policy SS12 sets out the Council's expectations concerning securing contributions from development sites, including sites in multiple ownership. A Developer Contributions SPD will provide detail of how contributions will be calculated. The Plan encourages applicants on multiple ownership sites to work with the Council and other landowners on joint funding arrangements to coordinate contributions; and to enter into Land Equalisation Agreements to ensure equitable distribution of benefits.</p> <p>Note that whilst allocation DSL4 Cornhill East Leek has multiple owners, the majority of the site is owned by the District Council.</p> <p>The Council's Viability Study shows that the site is viable (including taking account of access construction costs).</p> <p>The NPPF states Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	
LPS394	Paragraph	9.35	Seabridge Developments Limited		<p>This representation is submitted by an agent on behalf of Seabridge Developments Limited who are concerned that the assumed densities are unrealistically high and do not reflect market signals. They particularly appear to neglect the significant constraints associated with Site BDNEW. Additionally, they suggest that the overall capacity of the main site to the west of the bypass should be reduced to reflect the significant site constraints and that if retained (Seabridge strongly suggest it should be deleted), development should be reduced to no more than 25 dph. Seabridge consider that the overall site density should be reduced to 20 dph-25 dph. This would reflect the site's sensitive edge of settlement/open countryside location.</p>					<p>The supporting text to Policy DSB1 in the Submission Version Local Plan (paragraph 9.35) explains that the density levels vary across the site with the highest level assumed for the area between the bypass and Tunstall Road and lower levels for the most constrained parts of the site. It is not considered that the density levels are excessively high – land to the west of the bypass has been assumed to have either 29dph or 35dph density. When calculating density levels on this site the Council needs to consider making best use of the land to minimise incursions into the Green Belt. With this in mind, 20-25 dph is considered to be too low.</p>	No
LPS405	Paragraph	9.36	Seabridge Developments Limited		<p>At the Preferred Options stage, Seabridge commented that the final sentence in this paragraph made a somewhat disingenuous and misleading reference to the Green Belt Review (see LPPO2552). Seabridge note that in this version of the Plan, the text has since been modified and now contains acknowledgement that all of the land on the west side of Biddulph Valley Way has high landscape sensitivity. However, it appears that despite the reference to high landscape sensitivity, the Council continued to ignore the unsuitability an inappropriateness of BDNEW.</p> <p>This paragraph also contains a reference to the Green Belt Review which, it starts, recommends the creation of a new settlement edge to the west of the Biddulph Valley Way. In actual fact, the Green Belt Review appraises the land to the west of Biddulph</p>					<p>It is acknowledged that development of BDNEW would have a high landscape impact, as stated in the Council's Landscape, Local Green Space and Heritage Impact Study. The policy wording of DSB1 does require a landscaping plan to include the submission of landscape and visual impact assessments. The policy also requires creation of a new settlement edge to prevent urban sprawl over the longer term (as recommended in the Council's Green Belt Review).</p> <p>The Green Belt Review's overall conclusion for both BDNEW and BD062 is the same - they could both be considered for release from the Green Belt.</p>	No

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					Valley Way as making a 'contribution' to checking sprawl, preventing encroachment, preserving setting and a 'limited contribution' to maintaining separation. The Green Belt Review does not compare favourably with other more suitable locations previously identified by the Core Strategy Inspector. The SHLAA findings for this area (previously BD140, BD140a and BD116) clearly state that development in this location would not be appropriate due to breaching the Biddulph Valley Way (which provides a strong edge to the settlement) and intrusion into the open countryside to the detriment of the rural character of the area.					In determining which sites should be included in the Local Plan, the Council must balance relevant evidence, Government planning policy and public opinion. The Core Strategy Inspector states that sites in the Green Belt at Gillow Heath 'could' form the basis for small urban extensions. He also states that "it would clearly be premature and therefore inappropriate to give detailed consideration to those sites at this stage". The SHLAA being referred to was published in 2015 alongside the Site Options Local Plan Consultation. This was an early stage in the Local Plan production process and key evidence base documents were yet to be undertaken e.g. the Green Belt Review. Circumstances have changed since these SHLAA records were created.	
LPS395	Paragraph	9.39	Seabridge Developments Limited		This representation is submitted by an agent on behalf of Seabridge Developments Limited who are concerned that the Council has made too optimistic assumptions about significant constraints associated with Site BDNEW that have yet to be fully evaluated, including: the mining legacy and the impact of numerous disused mineshafts, the water course, significant ecological constraints, and topographical landscape issues. Site BDNEW has been identified for sometime and yet it has not been developed. It may take several years to be fully implemented and even then, it is unlikely to deliver the number of dwellings anticipated by the Council.					The supporting text to Policy DSB1 in the Submission Version Local Plan (paragraph 9.35) explains that the density levels vary across the site with the highest level assumed for the area between the bypass and Tunstall Road and lower levels for the most constrained parts of the site. It is not considered that the density levels are excessively high – land to the west of the bypass has been assumed to have either 29dph or 35dph density. When calculating density levels on this site the Council needs to consider making best use of the land to minimise incursions into the Green Belt. The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24 th April 2018). Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.	No
LPS193	Paragraph	9.40	Mr Andrew Leyskens	LDF Assessor United Utilities Water Limited	United Utilities supports the inclusion of their recommended wording until Paragraph 9.4. They would like to emphasise that they support the delivery of development at Wharf Road Strategic Development Area, in accordance with a comprehensive masterplan. They strongly encourage any site wide masterplan for all parcels of land which fall within the allocation to be completed prior to the submission of any application for planning permission.					Comments noted.	No
LPS396	Paragraph	9.40	Seabridge Developments Limited		This representation is submitted by an agent on behalf of Seabridge Developments Limited who are concerned that the Council has made too optimistic assumptions about significant constraints associated with Site BDNEW that have yet to be fully evaluated, including: the mining legacy and the impact of numerous disused mineshafts, the water course, significant					The supporting text to Policy DSB1 in the Submission Version Local Plan (paragraph 9.35) explains that the density levels vary across the site with the highest level assumed for the area between the bypass and Tunstall Road and lower levels for the most constrained parts of the site. It is not considered that the density levels are excessively high – land to the west of the	No

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					ecological constraints, and topographical landscape issues. Site BDNEW has been identified for sometime and yet it has not been developed. It may take several years to be fully implemented and even then, it is unlikely to deliver the number of dwellings anticipated by the Council.					<p>bypass has been assumed to have either 29dph or 35dph density. When calculating density levels on this site the Council needs to consider making best use of the land to minimise incursions into the Green Belt.</p> <p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.</p>	
LPS397	Paragraph	9.43	Seabridge Developments Limited		This representation is submitted by an agent on behalf of Seabridge Developments Limited who are concerned that the Council has made too optimistic assumptions about significant constraints associated with Site BDNEW that have yet to be fully evaluated, including: the mining legacy and the impact of numerous disused mineshafts, the water course, significant ecological constraints, and topographical landscape issues. Site BDNEW has been identified for sometime and yet it has not been developed. It may take several years to be fully implemented and even then, it is unlikely to deliver the number of dwellings anticipated by the Council.					<p>The supporting text to Policy DSB1 in the Submission Version Local Plan (paragraph 9.35) explains that the density levels vary across the site with the highest level assumed for the area between the bypass and Tunstall Road and lower levels for the most constrained parts of the site. It is not considered that the density levels are excessively high – land to the west of the bypass has been assumed to have either 29dph or 35dph density. When calculating density levels on this site the Council needs to consider making best use of the land to minimise incursions into the Green Belt.</p> <p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.</p>	No
LPS402	Paragraph	9.45	Seabridge Developments Limited		This paragraph acknowledges that the Green Infrastructure Strategy aims to protect and improve the Biddulph Valley Way, to increase its use and act as a wildlife corridor. However, the setting and function of the Biddulph Valley Way can only be significantly compromised by the creation of a new estate road access from the main strategic site to the east into the open fields to the west.					<p>It is not agreed that the Biddulph Valley Way would be significantly compromised by another vehicular crossing. Several already exist further north (at Halls Road, Mow Lane, Marshgreen Road) so this proposal does not set a precedence. The site policy requires the design of the access road to ensure the safety of users of the BVW. It is not considered that a new road would conflict with the priorities and actions set out in the Green Infrastructure Strategy for the Biddulph corridor.</p>	No
LPS403	Paragraph	9.46	Seabridge Developments Limited		The landscape at BDNEW should not be underestimated. As noted in this paragraph, there are public footpaths in the vicinity of the site and any development to the west of the Biddulph Valley Way would have a high visual impact within the wider landscape. It would be seen as sprawling into open countryside beyond what is currently a strong, well-defined and mature landscaped edge to the town.					<p>It is acknowledged that development of BDNEW would have a high landscape impact, as stated in the Council's Landscape, Local Green Space and Heritage Impact Study. The policy wording of DSB1 does require a landscaping plan to include the submission of landscape and visual impact assessments. The policy also requires creation of a new settlement edge to prevent urban sprawl over the longer term (as recommended in</p>	No

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										the Council's Green Belt Review). In determining which sites should be included in the Local Plan, the Council must balance relevant evidence, Government planning policy and public opinion.	
LPS88	Wharf Road Strategic Development Area	Policy DSB 1	Mr Stephen Dobbs		<p>Respondent contends that with regard to Biddulph, the Local Plan is discriminatory and contravenes the Human Rights Act 1998. This is because people who want to retain the countryside and in particular the Green Belt, have been singled out to be negatively impacted by the Local Plan if it is adopted in its present form. Respondent is of the view that the countryside, including the national parks and the Green Belt, should remain as countryside and not be developed. They believe that others also hold this view. According to the respondent, SMDC's Equalities Impact Assessment fails to consider people's beliefs.</p> <p>Analysis reveals that of the 7,655 houses that the initial list of sites presented as being potentially suitable for development, 6,576 of these were located in the Green Belt. As such, 14% of the suggested housing development was on non-Green Belt land. Additionally, the list of sites contained: (1) no substantial vertical development; and (2) no substantial proposals to repurpose land earmarked for industrial or retail development for housing. The Council clearly set out from the beginning to make sure that some Green Belt development was included within the Plan.</p> <p>Furthermore, the process of putting together the current version of the Local Plan has been discriminatory in its failure to adequately consider suitable alternatives which would negate the need to develop the Green Belt. For example, redevelopment of existing housing stock to convert them into more densely packed communities (converting houses into flats/tower blocks), conversion of ex-industrial buildings such as the mill on Station Road into flats or demolishing it and replacing it with say a 6 to 7 storey tower, and the reallocation of land earmarked for business and retail development into housing such as the area immediately to the west of the bypass.</p> <p>The Plan as it stands is not utilising the opportunities available, as have previous developments in Biddulph. Many of the proposed non-Green Belt sites could equally well have flats built on them rather than houses. It is a waste of vertical space. Yet the Council seems to have taken an uncreative view when preparing the Plan, with the intent from the outset to discriminate against people like the respondent them self (as evidenced from the figures presented earlier) who want to preserve the Green Belt. The Council may contend that the alternatives are not economically viable. However, respondent feels that cheaper development is, in their view, not an excuse to justify discrimination.</p> <p>Respondent concludes by stating that the Green Belt is sacrosanct and that they consider it their church. Yet the Council has not proposed demolishing churches, mosques and synagogues to make way for new housing development. The failure by SMDC to</p>	<p>Firstly, the views of those who believe that the Green Belt should be preserved should be included in the Equalities Impact Assessment. This will ensure that it is recognised that people with these beliefs exist. Secondly, alternatives should be considered as serious options (see comment summary). Thirdly, the beliefs of those who wish to preserve the Green Belt should be considered by the Council in a way that is equal to any other belief group.</p> <p>If the time involved in carrying out the above would take too long, then the Council must remove all Green Belt development from the Submission Version Plan. The shortfall that this creates should be made up by converting housing developments and sites earmarked for retail or industrial development, into flats and tower blocks.</p>			No	<p>The Council has prepared the local plan in accordance with relevant legal obligations and planning guidance. The right to private and family life is one consideration in a wider mix of matters taken into account. The right is a qualified right, meaning, it is sometimes appropriate to interfere with the right if it is in the interest of the wider community or to protect other people's rights. All consultation responses have been considered and used to inform the planning balance of all the relevant considerations. Respondents whom have submitted representations to the Local Plan can appear at the examination to discuss their concerns if desired.</p>	No

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					recognise their view, as well as others, is discrimination.						
LPS194	Wharf Road Strategic Development Area	Policy DSB 1	Mr Andrew Leysens	LDF Assessor United Utilities Water Limited	United Utilities would like to emphasise that they support the delivery of development at Wharf Road Strategic Development Area, in accordance with a comprehensive masterplan. They strongly encourage any site wide masterplan for all parcels of land which fall within the allocation to be completed prior to the submission of any application for planning permission.					Comments noted.	No
LPS295	Wharf Road Strategic Development Area	Policy DSB 1	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>The existing heritage policies for this site are welcomed and should be retained. However, as the listed buildings are within the site, Historic England advise that their significance as a <i>whole</i> is assessed. It should be made very clear that this significance should be actively conserved (not simply assessed) as part of any proposal.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>	Historic England suggest the inclusion of the following: "The significance of the heritage assets, including the contribution made by their setting, should be robustly assessed to actively inform any development in this allocation".				It is considered that this is adequately covered in the policy and supporting text.	No
LPS299	Wharf Road Strategic Development Area	Policy DSB 1	Gallagher Developments Ltd	Gallagher Developments Limited	The inclusion of the housing allocation, Wharf Road Strategic Development site, is supported by the respondent. The policy aspiration to develop a comprehensive masterplan is noted. However, the respondents argues that in order to ensure the delivery of housing, the policy should be less restrictive and prescriptive so that the Plan does not prohibit appropriate development coming forward. Additionally, the respondent suggests that references to environmental issues and constraints at the site should be removed because they can be addressed through the scheme's design. Requirements to retain the existing watercourse should also be reviewed.	<p>An amendment (shown in bold) should be made to the following: "Development will be subject to comprehensive masterplanning that seeks to optimise the site in light of a robust understanding of the socio-economic objectives and relevant environmental and technical matters. That will also include:"</p> <p>The following should be deleted:</p> <ul style="list-style-type: none"> "Detailed investigation work in relation to the mining legacy of the site before development can commence" "De-culverting of the watercourse flowing beneath the site which 	Yes	No	Yes	<p>Support for inclusion of the site is welcomed.</p> <p>It is not considered appropriate to include the additional wording suggested ("that seeks to optimise the site....") as it is considered that this wording undermines the policy.</p> <p>It is not agreed that the text requiring a detailed investigation of the mining legacy should be deleted from the policy. It is considered that the masterplan must investigate this issue due to the mine shafts on the site. However, there are parts of the site which are not known to be affected by mining issues so it is considered appropriate to add the words ('where applicable') to the policy wording at the end of that bullet point to clarify that mining investigation on one part of the site would not hold up commencement on another part of the site not affected by mining. This can be explained at the end of paragraph 9.39 of the supporting text.</p> <p>It is not agreed that the text relating to de-culverting of the watercourse should be deleted from the policy. The inclusion of this was based on Environment Agency advice at an earlier stage in the process and they supported the inclusion of this wording at the Preferred Options Stage.</p> <p>It is considered appropriate to add wording to the supporting text (at paragraph 9.47) to reflect that the site will come</p>	Yes

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						<p>should be renaturalised through redevelopment"</p> <p>The following should be added:</p> <ul style="list-style-type: none"> "Early applications for development that would make a positive contribution to the policy objectives and/or facilitate the delivery of the wider Development Area would be welcomed." 				forward in phases and that following the masterplanning process early applications for development on part of the site that would make a positive contribution to the policy objectives and facilitate the delivery of the wider Development Area would be acceptable.	
LPS326	Wharf Road Strategic Development Area	Policy DSB 1	Mr Gez Willard	Willardwillard Ltd	<p>The site should be omitted from the Plan for the following reasons:</p> <ul style="list-style-type: none"> Is damaging to the functions and features of the Green Belt. Sites which are less damaging to the Green Belt (such as Sites BD138a and BD138b) should be allocated for housing instead. Its development would damage the use and enjoyment of the Biddulph Valley Way by enclosing it by housing development. It has not been shown that the site is deliverable in whole, or in part given its historic mining legacy. There is failure to show than an existing watercourse across the site can be retained or satisfactorily diverted having regard to its flow characteristics and environmental richness. It has not been shown that a suitable and safe access to the site can be formed. It has not been shown that an existing ecological interest on the site can be retained, enhanced or translocated. The site is in multiple ownerships and the Council have no evidence that all parties are willing and able to allow this site to proceed to development. <p>In conclusion, there is insufficient evidence to justify the allocation of this site within the Plan. Moreover, it is clear and evident that the release of the site from the Green Belt will cause significant harm.</p>					<p>The Council's Green Belt Review concludes that sites BD138a and BD138b are unsuitable for release from the Green Belt. BDNEW is considered suitable for release under exceptional circumstances.</p> <p>It is not agreed that the Biddulph Valley Way would be significantly compromised by another vehicular crossing. Several already exist further north (at Halls Road, Mow Lane, Marshgreen Road) so this proposal does not set a precedence. The site policy requires the design of the access road to ensure the safety of users of the BVW. It is not considered that a new road would conflict with the priorities and actions set out in the Green Infrastructure Strategy for the Biddulph corridor.</p> <p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.</p>	No
LPS358	Wharf Road Strategic Development Area	Policy DSB 1	Mr Martin		Respondent questions the deliverability of this site. The majority of the site is already allocated in the existing Core Strategy for development, but to date has not come forward. It is a large site			No	No	The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery	No

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			Webb		in multiple ownerships. There are complex mining legacy issues to deal with, which have not yet been fully assessed. There are also complex Section 106 contributions which will need to be agreed between the Council and all of the landowners. The respondent considers the proposed quantum of development to be unrealistic having regard to the application of a realistic lead-in time and build rate.					programme (agreed at Cabinet on 24 th April 2018). Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition. The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	
LPS390	Wharf Road Strategic Development Area	Policy DSB 1	Wainhomes (North West) Limited		Respondent questions the deliverability of this site. The majority of the site is already allocated in the existing Core Strategy for development, but to date has not come forward. It is a large site in multiple ownerships. There are complex mining legacy issues to deal with, which have not yet been fully assessed. There are also complex Section 106 contributions which will need to be agreed between the Council and all of the landowners. The respondent considers the proposed quantum of development to be unrealistic having regard to the application of a realistic lead-in time and build rate.			No	No	The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24 th April 2018). Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition. The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	No
LPS393	Wharf Road Strategic Development Area	Policy DSB 1	Seabridge Developments Limited		This representation is submitted by an agent on behalf of Seabridge Developments Limited who raise no objection, in principle, to the proposal. They do, however, object to the proposed BDNEW area (see Comment LPS392). The Plan does not provide any clear justification for the inclusion of Site BDNEW that was not consulted on before the Preferred Options Plan. Is the strategic site to the east of Biddulph Valley Way not viable without it? If so, where is the evidence? If not, then it seems the only justification for this site is that it is close to the main strategic site.					The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation in 2016. The site was then investigated by the Council to determine whether any constraints existed which made the site unsuitable for inclusion in the Local Plan. For example – Green Belt Review, county highways, land availability, impact on utilities, crossing the Biddulph Valley Way. Once the screening had taken place and it was determined that there were no known factors precluding the inclusion of the site, it was included in the consultation at Preferred Options Stage in 2017. The Council's Viability Study shows that the site is viable. The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site	No

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										<p>not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p>	
LPS473	Wharf Road Strategic Development Area	Policy DSB 1	Renew Land Development Ltd.		<p>This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at: (1) Newpool Farm, Newpool Road, Knypersley, Biddulph; and (2) Hurst Quarry, Hurst Road, Biddulph. They object to the extension of this mixed use allocation to include the land to the west that is currently Green Belt. There is no evidence base to support the allocations of this land in the Green Belt to the west of Wharf Road (Site BDNEW) in place of other previous preferred allocations in Biddulph (including Site BD063a).</p>		Yes	No	Yes	<p>The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.</p> <p>An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.</p> <p>All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.</p>	No

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LPS477	Wharf Road Strategic Development Area	Policy DSB 1	Renew Land Development Ltd.		This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at: (1) Jacksons Nurseries/Levens, Biddulph; (2) the former Meadows School, Biddulph (which adjoins the previously mentioned site); and (3) Cheadle Road, Upper Tean. They support the incorporation of the land at Jacksons Nurseries/Levens and the former Meadows School for housing development. It is considered that these sites, which comprise a mix of greenfield and previously developed land, represent an excellent opportunity to make a material contribution to the housing required in Biddulph in a location outside the Green Belt and in close proximity to the town centre (and thus local amenities and public transport connections).		Yes	Yes	Yes	Support noted.	No
LPS360	Tunstall Road Strategic Development Area (opposite Victoria Business Park)	Policy DSB 3	Mr Martin Webb		Respondent questions the deliverability of this site, which is in multiple ownerships. The Council suggests at Paragraph 9.65 that the owners will be encouraged to enter into an equalisation agreement; however it is not clear what the implications are if agreements cannot be reached. If viable, the site is unlikely to come forward in the early stages of the plan period.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work is being undertaken on key sites including the Tunstall Road Strategic Development Area (as stated in Policy DSB3) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.</p> <p>The Council's Viability Study shows that the site is viable.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS398	Tunstall Road Strategic Development Area (opposite Victoria Business Park)	Policy DSB 3	Wainhomes (North West) Limited		Respondent questions the deliverability of this site, which is in multiple ownerships. The Council suggests at Paragraph 9.65 that the owners will be encouraged to enter into an equalisation agreement; however it is not clear what the implications are if agreements cannot be reached. If viable, the site is unlikely to come forward in the early stages of the plan period.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work is being undertaken on key sites including the Tunstall Road Strategic Development Area (as stated in Policy DSB3) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.</p> <p>The Council's Viability Study shows that the site is viable.</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No

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LPS562	Tunstall Road Strategic Development Area (opposite Victoria Business Park)	Policy DSB 3	Mr & Mrs P Dowson		We confirm that we do not want our land (see attached plan) to be included in the proposed Wharf Road Strategic Development Area. We have no intention of selling and wish it to remain green for the duration of the resulting plan.					Comments noted. The loss of this parcel of land would not result in a reduction in housing delivery on the Tunstall Road Strategic Development Area. The site is primarily for employment use and the plan proposes a slight excess of employment land for allocation in Biddulph amounting to 1.7ha over the requirement. The land lost would be around 0.7ha so the employment requirement for Biddulph would also still be met. The land is positioned on the edge of the allocation and is not key for delivery of the strategic development area as a whole.	No
LPS218	Cheadle North Strategic Development Area	Policy DSC 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) support Policy DSC1 in that it makes provision for a new County Primary School and school/community playing pitches. This makes the best and most efficient use of the land compared to the alternative of separate provision of the community playing pitches and associated facilities (e.g. parking) which would potentially take up more developable area. There currently remain question marks over the school site and how it relates to other policy requirements. SCC are currently working through these with SMDC, and are committed to delivering a dual use facility.					Support noted. The Council will continue to work with Staffordshire County Council to deliver the school site and associated infrastructure.	No
LPS349	Cheadle North Strategic Development Area	Policy DSC 1	Mr Martin Webb		Respondent questions deliverability of this site. Part of the site is already located within the development boundary for Cheadle and identified in the Core Strategy as a broad location for housing. However, to date the site is yet to come forward. It is not clear whether the proposed development, including the new school, would be viable. In the respondent's experience, a development of this scale would not be able to viably fund the delivery of a new primary school. They consider that the proposed quantum of development is unrealistic having regard to the application of a realistic lead-in time and build rate.			No	No	A planning application has been submitted for this site which includes land for a new primary school. The Council has been working closely with Staffordshire County Council to deliver the new primary school which will meet the wider needs of Cheadle. The viability study considers that the site is viable.	No
LPS404	Cheadle North Strategic Development Area	Policy DSC 1	Wainhomes (North West) Limited		Respondent questions deliverability of this site. Part of the site is already located within the development boundary for Cheadle and identified in the Core Strategy as a broad location for housing. However, to date the site is yet to come forward. It is not clear whether the proposed development, including the new school, would be viable. In the respondent's experience, a development of this scale would not be able to viably fund the delivery of a new primary school. They consider that the proposed quantum of development is unrealistic having regard to the application of a realistic lead-in time and build rate.			No	No	An application has now been submitted for this site which includes land for a new primary school. The Council has been working closely with Staffordshire County Council to deliver the new primary school which will meet the wider needs of Cheadle. The viability study considers that the site is viable. The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	No
LPS78	Paragraph	9.81	Mr T A J Campbell		The respondent welcomes the important role that Moberley Strategic Development Area plays in the housing strategy for Cheadle. However, they contend that the Plan is unsound because it does not maximise the potential of the sustainable location of this strategic development site, through the development of SHLAA site CH093. They make the point that this	SHLAA site CH093 should be allocated for housing as part of the already identified Moberley Strategic Development Area or at the very least, be identified as	Yes	No	Yes	<ul style="list-style-type: none"> • CH093 was considered as part of the Green Belt Review Study and the overall impact of development on the purposes of the Green Belt was considered to be moderate. <ul style="list-style-type: none"> ○ Check unrestricted sprawl – contribution 	No

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					limited allocation is not consistent with national policy because the Green Belt boundary in respect of SHLAA site CH093 was not re-examined, in accordance with paragraphs 83-85 of the NPPF. As such, this strategic development site will not be developed to its full potential as it would be if the additional land was also identified as being suitable for housing.	safeguarded land outside of the Green Belt, to be developed in the plan period if other allocated sites do not come forward within the next five years.				<ul style="list-style-type: none"> ○ Prevent towns merging – limited contribution ○ Safeguarding from encroachment – contribution ○ Setting of towns – contribution ● The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances and although concludes that it could be considered for release, exceptional circumstances would need to be justified. ● The Landscape, Local Green Space and Heritage Impact Study considers the site to be of high landscape sensitivity. Some screening is provided by woodland to the south, particularly when viewed from the A522, however the land rises up from the woodland and visual prominence increases. The site does not fit well within existing settlement pattern and development of the site would adversely affect the existing settlement pattern and edge, and encroach on countryside. ● It is considered that there are no exceptional circumstances to justify amendment of the Green Belt boundary in this location or to safeguard land outside of the Green Belt if other allocated sites do not come forward. There are other housing sites available in Cheadle not located in the Green Belt. ● Cheadle's requirement has already been increased to reflect development capacity. 	
LPS79	Paragraph	9.82	Mr T A J Campbell		The respondent expresses two concerns with regard to this paragraph. Firstly, access to the Moberley Strategic Development Area cannot be gained from some parts of the existing road network. Access to the area can be achieved via land north of the veterinary practice which is currently in the Green Belt. Secondly, the Submission Version Plan recommends that land is taken out of the Green Belt for access to Site CH128 but not the larger site, CH093. Yet the Green Belt Review (November 2015) identifies the limited role that both sites play in the function of the Green Belt to the south west of Cheadle. It is therefore illogical to take one site out of the Green Belt and not the other, given the clear physical and easily defensible boundary to CH093 and the need for a comprehensive approach to the development of the Moberley Farm Area.	SHLAA site CH093 should be taken out of the Green Belt and allocated for housing, as part of the Moberley Strategic Development Area (Policy DSC3).	Yes	No	Yes	<ul style="list-style-type: none"> ● A limited part of the Moberley Strategic Development Area could be served by accesses through the adjacent housing estate, however comprehensive development and delivery of the site depends on another access. ● CH128 forming part of the Moberley Strategic Development Area can provide access to the whole site. Although it is located in the Green Belt it is a small site (0.9ha) and is well related to the settlement of Cheadle. ● CH093 is a much larger site (approximately 5.5 ha) and would significantly extend into the Green Belt. Although the site could allow for an alternative access into the strategic site there are other housing sites available in Cheadle not located in the Green Belt. ● The Landscape, Local Green Space and Heritage Impact Study considers the site to be of high landscape sensitivity. Some screening is provided by woodland to the south, particularly when viewed from the A522, however the land rises up from the woodland and visual prominence increases. The site does not fit well within existing settlement pattern and development of the site would adversely affect the existing settlement pattern and edge, and 	No

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										encroach on countryside.	
LPS80	Paragraph	9.84	Mr T A J Campbell		Respondent does not object, in principle, to what is said in this paragraph apart from the reference to the link road.		Yes	Yes	Yes	Agree that the following words 'the link road does not impact' can be deleted and replaced with 'roads within the site do not impact'.	Yes
LPS82	Paragraph	9.88	Mr T A J Campbell		The assertion that the main access to the Moberley 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. These alternatives would only require minor adjustments to the Green Belt boundary and would be fully justified by the need to bring this site "on stream" quickly, given the shortfall of new deliverable sites in Cheadle.	The first sentence in this paragraph should be deleted.	Yes	No	Yes	<ul style="list-style-type: none"> A limited part of the Moberley Strategic Development Area could be served by accesses through the adjacent housing estate, however comprehensive development and delivery of the site depends on another access. CH128 forming part of the Moberley Strategic Development Area can provide access to the whole site. Although it is located in the Green Belt it is a small site (0.9ha) and is well related to the settlement of Cheadle. The land is in separate land ownership and available. 	No
LPS83	Moberley Farm, Cheadle	Policy DSC 3	Mr T A J Campbell		<p>The allocation of this site for residential purposes is welcomed. However, the respondent is too prescriptive in the way the development should proceed and possibly too restrictive in the number of dwellings being suggested. Paragraph 17 of the NPPF requires planning authorities to focus significant development in locations which are sustainable. The Moberley Strategic Development Area is just that, with good links to the town centre by modes of transport not involving the private car.</p> <p>The suggested density of approximately 430 dwellings on a site of 16.64 (presumably) hectares is low, even accounting for the need to provide open space within the development. The statement that the Council "will resist development which would undermine a comprehensive approach to the development of the site" is too negative, particularly given the importance of bringing some deliverable housebuilding sites in Cheadle forward quickly.</p>	The second sentence of this policy should be replaced with the following: "The Council will welcome a comprehensive approach to the development of this site." Additionally, the reference to an approximate number of dwellings in the first sentence should be deleted.	Yes	No	Yes	Policy DSC3 allows flexibility by the inclusion of 'approximately 430 dwellings'. A comprehensive master plan for the site will be required to have regard to open space and green infrastructure, mitigation measures such as landscaping and screening, SuDs and buffer strips alongside the river and access roads within the site.	No
LPS276	Moberley Farm, Cheadle	Policy DSC 3	Muller Property Group		<p>The respondent notes there have been amendments to the criteria set out in Policy DSC3. Whilst the representor agrees with these amendments, it is considered bullet point 2 should be revised to read as follows "Construction of development access and circulatory roads along the safeguarded route for a potential future link road of a sufficient design standard to facilitate a link road." The respondent also contends that the boundary of the site allocation should be amended to follow landscape features. It is considered the southern and western boundaries are arbitrary in landscape terms and fail to relate to any of the natural and manmade features on the ground.</p> <p>Following the preferred options consultation the Council's response to the consultation noted that the development boundary is not arbitrary as it lies outside of the Green Belt and within the town development boundary. Whilst it is accepted by</p>		Yes	No	Yes	<p>Consider that it is not necessary to add the additional wording 'and circulatory' (roads) within the policy wording.</p> <p>The major part of the allocation lies within the town development boundary and outside the Green Belt boundary therefore the boundary is not considered arbitrary. Policy DSC 3 requires a comprehensive approach to the development of this site which will include landscaping and screening which can create a soft edge to this area.</p> <p>The area outside the town boundary is Green Belt. The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. There are not considered to be exceptional circumstances to justify taking this area out of the Green Belt and there are other housing sites available in Cheadle not located in the Green Belt.</p>	No

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					<p>consultee that the existing boundary provides continuity to the built form, it is not an appropriate approach given the landscape and visual sensitivities of the site.</p> <p>Extension of the boundary south would help to deliver more housing and increase likelihood of delivery as access currently requires co-operation between landowners. With regard to providing additional housing, it is noted that the Officer's response to the respondent's previous representation LPPO2532 states there is no requirement for additional housing. The respondent argues this does not comply with the NPPF which seeks for the Council to provide a more proactive and positive approach to securing residential development.</p>						
LPS296	Mobberley Farm, Cheadle	Policy DSC 3	Ms Christina Sinclair (Historic England)	Willardwillard Ltd	<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>The 'Landscape, Local Green Space and Heritage Impact Study' identified this allocation as having a harmful impact upon the setting and significance of the Grade II listed Mobberley Farm. This merits careful consideration. The policy wording would benefit from clarification that the starting point should be to avoid harm in heritage terms before mitigation is considered.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>					<p>Agree that some text could be added to the supporting text in paragraph 9.85 to clarify this. 'There are two Grade II Listed Buildings within 400m of the southern section of the site, as a farm the agricultural setting is considered to contribute to the overall significance of the asset. It is considered that mitigation through screening of the southern edge of the site would reduce those effects <u>however the comprehensive masterplan for the site should avoid harm in heritage terms before mitigation is considered.</u> The development access road has also been assessed as part of a wider link road in the Heritage Impact Study.'</p>	Yes
LPS327	Mobberley Farm, Cheadle	Policy DSC 3	Mr Gez Willard	Willardwillard Ltd	<p>This is a convoluted policy in that it is borne out of the political expediency of council members in changing the housing distribution in favour of Cheadle away from the rural areas. The council officers have been pressured into finding alternative sites from those proposed in 2016, and have returned to this site which was omitted from consideration during the Examination of the current adopted Core Strategy. The respondent references the Inspectors thoughts at the time of Examination, with regard to Mobberley Farm. He expressed concern over the scale of the development and its relationship with a south western link road. The respondent therefore argues that it is unclear why the Council have revisited this site, in the Submission Version Plan.</p> <p>The policy as it stands focuses on the development of a link road, rather than constraints in the area with regard to flooding, coal mine working, ecology, heritage and landscape terms. Yet this policy does not make clear whether the alignment or the funding for the proposed link road is agreed or secured. If the link road is a genuine planning requirement that must be delivered as part of the development, then a much clearer and certain policy framework must be put in place: "No development of any dwelling shall commence until the link road has been constructed</p>					<p>The Mobberley Farm Strategic Area was not included as a broad area for housing in the Core Strategy. The Core Strategy acknowledges that the Council will need to assess the need for other broad locations for housing to meet the longer term needs of Cheadle and identify suitable areas through the review of the Core Strategy.</p> <p>Policy DSC 3 does not require the construction of a link road but requires the construction of development access roads along the safeguarded route for a potential future link road of a sufficient design standard to facilitate a link road. Policy DSC 3 also requires a FRA, ground conditions survey, ecological surveys and consideration of landscaping and heritage.</p>	No

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					and made available for use for its intended purpose”.						
LPS343	Mobberley Farm, Cheadle	Policy DSC 3	Mr Paul Hill	RPS Planning & Development	<p>The Council has identified and assessed this site as part of smaller parcels of land in the Strategic Housing Land Availability Assessments (SHLAA). The Council has also undertaken a range of evidence base studies to inform the deliverability of the site. The assessments of Mobberley Farm indicate that the site scores well against the Council's Sustainability Framework and there are no overriding reasons why the site cannot come forward for development.</p> <p>The development of Mobberley Farm would involve the release of a small parcel of Green Belt land on parcel CH128, which is required to gain access to the site. This is a small parcel of land that RPS consider insignificant to the wider purposes of the Green Belt and its release can be justified through the exceptional circumstances of delivering strategic growth in Cheadle. RPS support Staffordshire Moorland's Green Belt Review, which recommends the release of this parcel from the Green Belt.</p> <p>The site has been allocated for 430 dwellings, partly reflected by the site's amended boundaries to avoid areas of flooding. RPS consider that informed by a masterplan led approach, there may be scope to further refine the boundary to present the most effective use of the site. The SHLAA and subsequent studies considered a potential capacity for 523 dwellings. The respondent has attached a table showing the chronology of evidence base work for the site (parcels CH085a, CH085b, CH085c, CH085d and CH128).</p> <p>With regard to the first paragraph of the policy, RPS is supportive of an approach to comprehensive masterplanning. However, this should not be at the expense of certain areas of the site proceeding as separate planning applications to ensure timely delivery of the site. As the Council's Transport Study (Phase 2) explains, access to part of the site is achievable from Litley Drive and Dandillion Avenue.</p> <p>RPS remain open to working with the Council beyond the consultation period to explore in more detail how this site could come forward and present a capacity led approach to development at Mobberley Farm. They will also look in advance of the Examination to work with the Council to refine its evidence base including the production of a comprehensive masterplan for the site, which they could potentially include within a Statement of Common Ground with the Council.</p>	RPS does not consider the policy sound due to the inclusion of the second bullet point (see Comment LPS339). Additionally, they feel the reference to Policy H3 (last bullet point) should be removed because all of the policies in the Plan should be read together.	No		<ul style="list-style-type: none"> Support for the site is noted. The number of dwellings included in Policy DSC3 states 'approximately 430'. The housing capacity for the site reflects the need to accommodate a buffer strip adjacent to the river, potential future link road, areas of open space/SUDs and landscaping. Agree that all the policies in the Plan should be read together. Rather than adding more text to each Strategic Development Area policy regarding affordable housing it is considered appropriate in this case to add a reference Policy H3. 	No	
LPS351	Mobberley Farm, Cheadle	Policy DSC 3	Mr Martin Webb		<p>Respondent questions deliverability of the site. The site is in multiple ownerships, and Policy DSC3 states that the Council will resist development which would undermine a comprehensive approach to the site. It is considered the proposed quantum of development is unrealistic having regard to the application of a realistic lead-in time and build rate.</p>		No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018) which includes this site.</p> <p>The viability study considers that the site is viable.</p> <p>The housing trajectory is based on an analysis of sites that have</p>	No	

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										planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	
LPS400	Mobberley Farm, Cheadle	Policy DSC 3	Wainhomes (North West) Limited		Respondent questions deliverability of the site. The site is in multiple ownerships, and Policy DSC3 states that the Council will resist development which would undermine a comprehensive approach to the site. It is considered the proposed quantum of development is unrealistic having regard to the application of a realistic lead-in time and build rate.			No	No	The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018) which includes this site. The viability study considers that the site is viable. The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	No
LPS135	Paragraph	9.96	St Modwen		St Modwen support the "more flexible approach" to the development of Blythe Vale. Furthermore, the reference to the Constellation Partnership in this paragraph is helpful because it reflects the joint working and liaison that the Council has undertaken with neighbouring LPAs and LEAs to ensure the Plan is positively prepared, justified and effective. Stafford Borough Council are recorded within the 'Site Proformas' document (February 2018, page 535) as supporting the Blythe Vale development as a partner authority within the Constellation Partnership. This is also evident in the Duty to Co-operate Statement (February 2018), where it is recorded that Staffordshire County Council, Stafford Borough, East Staffordshire, Stoke-on-Trent and Newcastle Under Lyme Councils have all acknowledged the allocation of Blythe Vale as a mixed use development. None of these LPA objected to the Preferred Options Local Plan 2017, where the mixed use was identified.					Support noted.	No
LPS136	Paragraph	9.97	St Modwen		With regard to the third sentence within this paragraph, this is a significant advantage and enables the identification of the Blythe Vale site to be both consistent with the Spatial Strategy (directing growth to the most sustainable larger villages) and government policy (the NPPF and Draft NPPF). Its development ensures that other Green Belt locations need not be released. Alternative sites to Blythe Vale were appraised within the SA, but were discounted because they required Green Belt release (Paragraphs 6.824-6.825). An explanation for these sites being discounted is detailed on page 539 of the Site Proformas document (February 2018).					Comments noted.	No
LPS134	Blythe Vale	Policy DSR 1	St Modwen		St Modwen support the proposal to develop the land identified within Policy DSR1 for mixed use development. The criteria within this policy refer to a comprehensive masterplan being prepared. St Modwen state that they are willing					Support noted.	No

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					<p>to enter into an agreement with other landowners to secure appropriate connections within the allocation.</p> <p>With regard to phasing of the development, the first phase within this allocation already benefits from a resolution to grant detailed planning permission, subject to the completion of a Section 106 Agreement. The S106 Agreement, at the time of writing this representation, is almost finalised and expected to be completed within the next seven dates. The scheme is consistent with Policy DSR1.</p> <p>With regard to technical considerations, the application proposals were designed to include a junction and access road that accommodated the wider development of the site. Pre-application discussions held with the District Council and the Highways Authority, as well as consultation responses (including those from Highways England), confirmed that the proposed junction and access road could be extended to serve the wider allocation. In addition, the Phase 1 proposal included the provision of suitable crossing facilities to enable access on foot and bicycle to the existing facilities in the village. These will be delivered through a S278 Agreement. The scheme was approved by the Planning Committee with no technical objections. Statutory consultees (such as Network Rail, the Environment Agency and Highways England) were all consulted.</p> <p>The planning application for the first phase of residential development tested the impacts of the development on the surrounding network and A50 and as a result, the early engagement has already commenced.</p> <p>Additionally, the phase 1 planning application included a full suite of technical studies (some of which cover the phase 2 sites). The criterion within this policy concerning appropriate landscaping (and mitigation) and the consideration of biodiversity, are areas already known to St Modwen that will be factored into the development.</p>							
LPS168	Blythe Vale	Policy DSR 1	Mr Yendole	Forward Planning Stafford Borough Council	<p>Stafford Borough Council welcome the reference to producing a masterplan, and wish to be consulted on the masterplan in due course. They state that it is important that the masterplan is of high quality design within the existing natural environment, with further clarification on when key infrastructure will be triggered (particularly that associated with the A50 corridor). Stafford Borough Council also welcome the commitment to landscaping on the south side of the A50.</p> <p>Stafford Borough Council also welcome the opportunity to enter into a Statement of Common Ground with SMDC for submission of the Local Plan.</p>					Support noted. The Council will continue working closely with Stafford Borough Council as part of the Duty to Cooperate.	No	
LPS172	Blythe Vale	Policy DSR 1	Jacque Leach		<p>This development was not in the adopted Core Strategy and appears to have been added after the Blythe Business Park was passed. There will now be 48.5ha of development, plus an 8.58ha mixed use employment development, within an area of two miles. This will put pressure on Blythe Bridge and surrounding</p>	The Blythe Business Park application should be revoked.	No	No	No	The Local Plan will replace the Core Strategy. It is a review of Core Strategy and it's polices and contains site specific allocations.	No	

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					<p>villages such as Hilderstone, which already experience issues with large lorries travelling through on narrow roads.</p> <p>The respondent understands that the Planning Committee will be going through the feedback given in order to decide which parts of the development will be put to the Inspector. However, all of the comments should reach him. The Blythe Business Park applications should never have been passed. The residents are still highly concerned about the disturbance of toxic waste, as well as flooding. Blythe Business Park receives many flood warnings, and the EA states that the location was chosen after catastrophic flooding in 1987.</p>	<p>The SMDC planning officer recommended refusal for the Blythe Business Park application, one of the reasons being the settlement hierarchy. The Planning Committee ignored this and the application was passed. The Government Ombudsman said that this was the worst case they had seen in 25 years of service but nothing could be done until the police investigation had concluded. Several members of the Planning Committee have been investigated. The Local Plan cannot be accepted until all legal procedures are followed. VVSM wanted to take this to Judicial Review and they had the support of a barrister but they could not continue because they hadn't raised the £40,000 required (they'd raised and spent £15,000).</p>			<p>The Blythe Business Park application has been through due process and has the benefit of planning consent. The Local Plan takes account of all sites with planning consent in terms of commitments. Outline planning permission SMD/2014/0576 was granted on 24/5/2016 for up to 168 dwellings and up 33,480 square metres of B1, B2 and B8 floorspace & ancillary works to include community centre and shop.</p>		
LPS219	Blythe Vale	Policy DSR 1	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council	Staffordshire County Council (SCC) acknowledge that this policy makes reference to inclusions of 'Measures to improve sustainable transport routes' and specifically references the existing schools within the town as destinations to be considered.					Comments noted.	No
LPS361	Blythe Vale	Policy DSR 1	Mr Martin Webb		Respondent questions the deliverability of site. They note that the Council resolved to grant planning permission for the first phase of the residential development in November 2017, although the Section 106 agreement is yet to be completed (LPA ref: SMD/2017/0512). However, there are significant infrastructure requirements associated with the development of the site, and it falls under multiple ownerships. It is also not clear whether future phases of residential development will need to cross-subsidise the proposed employment development. There remains insufficient evidence that the proposed quantum of development is realistic, having regard to the application of a realistic lead-in time and build rate.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work will be undertaken on key sites including the Blythe Vale site as stated in Policy DSR1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the site to fruition.</p> <p>St Modwen Properties PLC have been granted planning permission on the north west part of the site for 118 dwellings and anticipate development starting before the end of 2018 with first completions early 2019. They intend to submit a phase 2 application. (Respondent ID1132139)</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates</p>	No

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										based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	
LPS409	Blythe Vale	Policy DSR 1	Wainhomes (North West) Limited		Respondent questions the deliverability of site. They note that the Council resolved to grant planning permission for the first phase of the residential development in November 2017, although the Section 106 agreement is yet to be completed (LPA ref: SMD/2017/0512). However, there are significant infrastructure requirements associated with the development of the site, and it falls under multiple ownerships. It is also not clear whether future phases of residential development will need to cross-subsidise the proposed employment development. There remains insufficient evidence that the proposed quantum of development is realistic, having regard to the application of a realistic lead-in time and build rate.			No	No	<p>The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).</p> <p>Masterplanning work will be undertaken on key sites including the Blythe Vale site as stated in Policy DSR1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the site to fruition.</p> <p>St Modwen Properties PLC have been granted planning permission on the north west part of the site for 118 dwellings and anticipate development starting before the end of 2018 with first completions early 2019. They intend to submit a phase 2 application. (Respondent ID1132139).</p> <p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS529	Blythe Vale	Policy DSR 1	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	<p>The respondent objects to Policy DSR1, where the LPA propose to allocate part of an existing Regional Investment Site (RIS) for 300 dwellings.</p> <p>The Council seek to justify part of the release of the RIS for housing on the basis that it would remove the need to release Green Belt elsewhere in the District. However, the LPA have failed to recognise that the site itself was released from the Green Belt previously to specifically address strategic regional employment and investment needs.</p> <p>The Council's evidence base does not provide any evidence to robustly justify the release of this site for housing in preference to employment.</p> <p>Until late 2017, there had been no consultation on the release of part of the site for housing, and the Council's evidence base did not support this at all.</p> <p>The LPA did not and has not provided any further evidence to justify release of a site of regional importance for housing, and there is no evidence to suggest that the implications of releasing a large part of this site from employment land to a housing allocation has been fully considered under the Council's Duty to Co-Operate with neighbouring authorities, in particular Newcastle-under-Lyme Borough Council and Stoke-on-Trent City</p>		No	No	No	<p>The Council continues to work with neighbouring local authorities through the duty to co-operate. No objections from these bodies were received regarding Blythe Vale site. Policy DSR1 proposes a mixed use allocation on the site with a more flexible approach to employment development with the previous B1/B2 restriction no longer applying. It is recognised that the site is regionally important and the employment element of the allocation is considered separately from the employment land requirement for the District.</p> <p>The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process taking into account information from the evidence base, government policy and responses to the consultations. The Blythe Vale site was included in the Preferred Options consultation 2017</p> <p>The Sustainability Appraisal provides a detailed assessment of alternative possible options including the spatial distribution of development. It includes an appraisal of the Blythe Vale site.</p>	No

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					<p>Council, who are currently preparing a new Joint Local Plan, and potential implications for the loss of this site on the wider economy of North Staffordshire over the next 25 years.</p> <p>Policy DSR1 is therefore contrary to Paragraphs 155, 157, 158, 165, 178 and 182 of the NPPF, and should be deleted. In its place, the previous strategy proposed in the 2016 Preferred Options Local Plan should be pursued in order to ensure sustainable development can be properly delivered in the rural areas, and in particular around the 'Larger Villages' where housing is required to meet rural housing needs and support sustainable development as required by Paragraph 55 of the NPPF. This should also include the allocation of BE041 as a housing site.</p>						
LPS297	Land east of Brooklands Way, Leekbrook	Policy DSR 2	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England raise a number of concerns regarding this site allocation, in line with their response provided for SMD/2014/0678. The highly designated (Grade II* listed) status of the farmhouse to the south should be clarified within the associated text, along</p> <p>with an outline of its significance, the contribution made by its setting, and the likely level of harm caused by development on the allocated site. Historic England advise that this analysis should inform more detailed site policies, should the site be taken forward in its current or amended form.</p> <p>The policy states that a Heritage Impact Study must be undertaken to demonstrate how heritage impacts have been mitigated. At a minimum, Historic England would recommend adding to this section to clarify that such an assessment should provide a robust assessment of significance (including the contribution made by setting), the level of harm caused to the heritage asset, how such harm has been minimised, a clear and convincing justification for any remaining harm and the public benefits of the proposal to aid decision making in line with the NPPF.</p> <p>Historic England also draw the Council's attention to the 'Landscape, Local Green Space and Heritage Impact Study', which states that the "site [is] suitable for development in heritage terms... <u>if development is limited to the western half of the site</u> [emphasis added] and an appropriate mitigation strategy put in place". This suggests the need to reconsider the site boundary. The same study also states that keeping new development to the western part of the site would reduce harm, not remove it and therefore remaining harm would need to be considered in line with (at minimum) paragraphs 131, 132 and 134 of the NPPF.</p> <p>Historic England advise that the Council consider whether this is a</p>					<p>The site formed part of a 'broad location for employment' for Leek in the 2014 Core Strategy: the site was referenced in the Strategic Development Areas Plan to the Core Strategy and the Policy assessed in the Implementation and Monitoring Plan to the Core Strategy (with delivery of Brooklands Way deemed to be of low risk). The Core Strategy was found sound following examination.</p> <p>The Council considers it appropriate to identify additional employment land for Leek across a range of locations, with good access to main roads such as the A520, to provide choice in locations around the town, to at least meet its residual employment land requirement. Leekbrook is closely related to the town of Leek, and it is considered that locations across Leekbrook can contribute towards the future employment land requirements for Leek where opportunities are more limited.</p> <p>As you state, the LLGSHIA recommends the site <i>is</i> suitable for development in heritage terms subject to site masterplanning and if development is limited to the western half of the site, as mitigatory measures. The policy sets out the Council's approach to heritage issues and therefore acknowledges these study findings by requiring future developments to do this. Schemes would need to provide a proportionate level of information as per para 128 NPPF. Whilst the LLGSHIA does not iterate the level of 'harm' as per paras 132-134 NPPF it does not use the term 'substantial harm' for this site [cf other sites].</p> <p>The Council uses evidence including heritage evidence and sustainability appraisal to justify its selection of its proposed allocation sites from wider sites. This evidence must be weighed against all other relevant considerations and other NPPF policies when the Council proposes allocations. The NPPF does not require that Local Plans do not cause <i>any harm</i> to heritage interests, rather that policies are justified according to public benefits, proportionate evidence base and SA alternatives.</p> <p>The Council is not aware of any financial and technical reasons to affect the deliverability of this site. Note that outline approval under SMD/2014/0678 is pending on this site.</p>	No

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					<p>deliverable site in line with the NPPF, 1990 Act and historic environment policies within the Local Plan.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). Historic England made the following further comments in relation to the Council's response to their representation: Appreciate your view here – our comments are to raise considerations from a historic environment perspective. In line with our previous advice we advise that Staffordshire Moorlands Council District Council makes sure it is happy with the deliverability of this site.</p>						
LPS298	Implementation and Monitoring	10	Ms Christina Sinclair (Historic England)	Willardwillard Ltd	<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England advise that the protection of the historic environment as a 'principal outcome' is added in line with the policy and text of the wider Local Plan and NPPF. This is including, but not limited to, policies E4, H1, H4 and DC1. They suggest the following wording: "Protection of heritage assets and their settings".</p> <p>Staffordshire Moorlands may also wish to consider adding "proactive partnerships and strategic work" to the implementation mechanism column for Policy DC2 to reinforce the positive strategy for the historic environment approach stated in Paragraph 126 of the NPPF.</p> <p>Further clarification was sought from Historic England on their representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.</p>					It is considered appropriate to make minor adjustments to the wording related to the 'principal outcomes' for Policy DC2 'the Historic Environment' to include the settings of heritage assets. It is not considered necessary to repeat this in the principle outcomes for the other policies.	Yes
LPS334	Implementation and Monitoring	10	Mr Gez Willard	Willardwillard Ltd	<p>The respondent does not object to the allocation of The Rocks (25) and High Lane (26c) as local green space.</p>					Comments noted.	No
LPS300	Implementation of Local Plan policies	Table 10.1	Ms Christina Sinclair (Historic England)		<p>The amendments made in line with Historic England's previous advice during the earlier development of the Plan are greatly welcomed. However, Historic England note that some comments have not been taken on board.</p> <p>Historic England suggest minor changes to the wording in this table, to clarify and bring it in line with the NPPF.</p> <p>Further clarification was sought from Historic England on their</p>	<p>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".</p>				Agreed. Minor modifications suggested.	Yes

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					representations to the Submission Version Local Plan. The Council's response to their representations was shared with them and they made further comments where they considered this to be necessary (see attached table). No further comments were made by Historic England about the Council's response to this representation.						
LPS87	Paragraph	10.4	Mr T A J Campbell		<p>Monitoring is all very well but there needs to be a commitment within a defined timescale to address those policies which are not working. For many years it has been the appeal system and not the Local Plan that has provided many of the new dwellings in the District. This has not been satisfactory for either residents or developers. It is therefore important that this Plan makes sufficient housing allocations to cater for a pent up demand and has contingency plans in place where sites are not brought forward quickly enough.</p> <p>Whilst the respondent is pleased about the continuing support for the Mobberley Farm development, they are concerned that if other sites in and around Cheadle are not developed or are slow to come forward, that the opportunity to build more houses by removing land from the Green Belt at Mobberley Farm is not being taken forward. The infrastructure that will be provided to serve the current Mobberley allocation would also serve more housing on an additional site that has independently been assessed as not contributing significantly to the purposes of Green Belt.</p>	<p>There needs to be a commitment in the Plan to reviewing the progress of allocated housing sites within no more than five years from their adoption. If the housing requirement is not met within a particular location then there needs to be an undertaking that further sites will be allocated to meet the shortfall in delivery.</p>	Yes	Yes	There is already a requirement for Local Plans to be reviewed at least once every five years. The plan takes account of the housing shortfall since 2012 by factoring this in to the residual requirement.	No	
LPS103	Leek East	Map A1.1	Mr Jonathan Hulme		<p>The respondent objects to housing allocations LE066 LE128, LE140, LE142a and LE142b. They contend that the Mount is an important, free, extensively used recreation facility for Leek, and its proximity to the town makes it easily accessible. It provides a rural escape for walkers, cyclists, joggers and families, and contributes towards their physical and mental wellbeing. The land at the Mount holds ecological importance and accommodates a variety of species, some of which appear on the UK Biodiversity Action Plan. The Mount also offers panoramic views of the town and surrounding moor land including the Roches. Housing development should therefore not encroach on this.</p> <p>Furthermore, the infrastructure in the east of Leek is insufficient to cope with a population influx. For instance, the schools and health facilities are already full. Additionally, the junctions with the A53 and A523 are quite dangerous and unsuitable for heavy use. Congestion is already a problem, and some form of traffic management is required. The proximity of the proposed housing allocation and wind turbine is also a health concern, as the turbine causes nausea inducing shadow flicker.</p> <p>The respondent feels that the excessive allocation of sites appears to be national policy implemented at a local level, without consideration of local needs and demographics.</p> <p>Lastly, the respondent asks the Council to publish the addresses of all councillors involved in the decisions making process so that they can be cross referenced against site options and preferred</p>	<p>Housing allocations LE066, LE128, LE140, LE142a and LE142b should be removed from the Plan due to health concerns and the loss of open space and wildlife habitats.</p>	No	No	<p>The public open spaces/Local Green Spaces proposed by the Council are those mapped in the consultation Local Plan. The Council's Local Plan policies seek to improve public access to open spaces/recreation generally where this is consistent with other policies. Development proposals affecting the routes of recognised public rights of way would need to make allowance for them. Note that all of the Mount sites identified in the consultation Local Plan are privately- (or SCC-) owned and are not currently designated open spaces.</p> <p>New housing schemes will need to incorporate areas of open space and landscaping, and also maintain existing pedestrian links as well as the consideration of new links.</p> <p>The Council uses evidence to justify its selection of 'Preferred' allocation sites from wider sites. This includes landscape impact evidence and a Green Belt Review. The western edge of Leek is covered by Green Belt (requiring more onerous justification in Government Policy to allocate compared to non-Green Belt). The most recent 2016 landscape impact study assessed impacts from the Peak Park, and concluded that the various Mount sites exhibited low- through to high- landscape sensitivity; it also provided recommendations regarding mitigatory measures. Note that landscape evidence must be weighed against all other relevant evidence when the Council proposes allocation sites.</p> <p>The Council would assess residential schemes in proximity to approved wind turbines in accordance with Local Plan and NPPF</p>	No	

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					sites, as rumours of corruption persist.					<p>amenity Policies, and ETSU (as amended) noise criteria etc. Note the Kniveden Farm turbine (SMD/2012/0760) was found acceptable by planning inspector on appeal and blade glint was not identified as an issue. Environmental Health conditions were attached to the consent pertaining to noise emissions.</p> <p>The Council consults with SCC Highways during Local Plan preparation. SCC did not raise any objections to sites LE022/ LE066 /LE128 /LE140 /LE142A /LE142B subject to development in this area contributing to the improvement of Mount Road including provision of footways and pedestrian links. Also Kniveden Lane should be brought up to adoptable standard with the implementation of footways. Further junction improvements at Mount Road/Ashbourne Road may also be appropriate. The Council would assess schemes having significant transport impacts against relevant NPPF and Local Plan policy (including requirement to submit transport statements, and provide highways improvements where deemed appropriate).</p> <p>The consultation Local Plan sets out Leek's residual housing and employment land requirements to 2031 in Policy SS4. The Council must demonstrate that it will fully meet the District's residual requirements to have a sound Local Plan in place. This requirement does not have to be met 100% from land allocations – unanticipated development of other urban brownfield/greenfield sites counts too (this would also include conversions of mills or other buildings) – the Policy factors in assumptions about future windfall housing (resulting in a lower residual requirement). This windfall would include urban sites not formally identified on the map. As there is insufficient capacity to meet the District's residual housing requirements entirely from sites within town and village boundaries, the remaining requirements to be met from a combination of urban (brownfield and greenfield) sites, and peripheral sites around the towns/villages.</p> <p>According to the 2006 Natural Environment and Rural Communities Act, the Council must in its Planmaking, have regard to the purpose of conserving biodiversity. The Council uses evidence to justify its selection of proposed allocation sites from wider sites, including ecological evidence. Note that ecology evidence must be weighed against all other relevant evidence when the Council proposes allocation sites. The Mount sites LE022/ LE066/ LE128/ LE140/ LE142A/ LE142B were all subject to a Phase I ecological survey in 2015 and a later 2017 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out ecological evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence. Policy NE1 requires schemes to demonstrate ecological mitigatory or compensatory measures where appropriate; and the protection and enhancement of habitats and species of principal importance. Further Policy NE2 ("Trees Woodlands and Hedgerows") protects trees and</p>	

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										<p>hedgerows, and in exceptional cases development involving the loss of trees would be required to replace or increase the existing canopy cover on site.</p> <p>The Council consults with SCC Education during Local Plan preparation, and SCC have indicated a need for additional first and middle-school land provision in Leek resulting from the town's development requirements. These are laid out in the consultation Local Plan. Site ADD01 is identified for the necessary expansion of Churnet View Middle School (if this site were allocated for the new first school site instead, middle school expansion would need to occur elsewhere in the town). Note SCC Education support both the location of the proposed Middle School expansion at Horsecroft; and the location of the new First School on the Mount, in the Local Plan (as the proposed location of the First School adjacent to the high school site offers potential for sharing of facilities e.g. playing fields).</p> <p>Contact details of all local Councillors are published on the Council's website.</p> <p>Any new developments would need to adhere to design policies to ensure character of the District is maintained.</p>	
LPS284	Leek East	Map A1.1	Anne Morris		Respondent raises concern over the site boundary of Plot 142b, which is proceeding under false premises. The respondent notes errors in the site description, specifically that Roche House Farm and its access track is not part of the site. What is included is Roche House Livery Yard, the owners of which would not agree to the livery being expanded to include housing. As a result, Plot 142b is subject to a number of access restrictions rendering the site landlocked and undeliverable.	Plot 142b should be deleted from Map A1.1 Leek East of Appendix 1 Leek Maps		No	No	<p>It may be feasible that alternative access to this site can be achieved. The NPPF requires that the Council demonstrate at examination that they have fully met their residual housing requirements; and that all proposed allocations proposed to do this are either 'deliverable' or 'developable' as per para 47 NPPF.</p> <p>Amenity – issues such as overlooking, screening and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.</p> <p>SCC Highways do not object to the inclusion of this site, and there is no indication that development of the site would necessitate the removal of the caravans.</p> <p>Trees protected by TPO require separate consent to fell, lop etc under the Planning Acts. In addition Local Plan Policy NE2 (Trees Woodlands and Hedgerows) requires schemes to retain existing trees in the first instance; and to at least replace, and possibly increase, canopy cover of a site; including in some cases, off-site provision.</p>	No
LPS275	Leek West	Map A1.2	Sainsbury's Supermarkets		Respondent supports the proposed revisions to the Leek town boundary. These revisions reflect the mixed-use planning permissions granted by the Council and more appropriately relate to the boundary of the site as now built, along with land for future development.			Yes		Support noted.	No
LPS176	Biddulph Town Centre	Map A2.2	Angela		This map does not include the whole town centre. It should include the two main town centre car parks, the superstore, the					The Town Centre boundary shown is for planning purposes only and is not intended to show the wider commercial area, just the	No

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			Turner		NHS doctor's building (PCT) and the library. This would reflect the true town centre and necessary infrastructure.					<p>retail core.</p> <p>Retail trends have changed significantly in the last 10-15 years (i.e. online retailing) and this has impacted on the numbers and types of businesses in town centres, particularly smaller ones like Biddulph.</p> <p>The boundary in the plan alongside the primary frontage shows the area where main town centre uses (such as retail) will generally be protected from proposals for changes of use. A more flexible approach to land uses will be taken on areas which fall outside of this boundary including the areas you specify with the aim of avoiding vacant units and land in more peripheral areas.</p>	
LPS58	Cheadle	Map A3.1	Providence Land Ltd.		Agent states that respondent supports the amendment to the Cheadle 'Proposed Town Boundary' to encompass planning permissions at land south of Thorley Drive (Ref. SMD/2016/0083) and subsequent reserved matters.		Yes	Yes	Yes	Support noted.	No
LPS59	Cheadle	Map A3.1	Providence Land Ltd.		<p>Agent states that respondent objects to the exclusion of the remainder of SHLAA Site CH075 b/c/d in the Proposed Town Boundary.</p> <p>At stated in the SHLAA, CH075a is a logical extension to the existing housing. In the assessment of the suitability of CH075 b/c/d the SHLAA states that in combination these could be a possible extension to existing housing, and that they are well related to the existing settlement.</p> <p>As such, the Plan is not positively prepared as it does not take account of growth potential in a sustainable location identified in the evidence base. Furthermore, it does not take account of the need for delivery of homes. This is a serious local problem but this site can perform.</p>	In order for the Plan to be positively prepared the Cheadle Town Boundary should be amended to include SHLAA Site CH075 a/b/c/d in its entirety. This would enable the delivery of additional housing in a sustainable location in addition to the opportunities identified in the SHLAA such as providing links with existing housing and pedestrian routes. Respondent has attached a suggested amendment to the Cheadle Town Boundary.	Yes	No	Yes	<p>This area was considered at the earlier site options stage and is of high landscape sensitivity (Landscape and Settlement Character Assessment) and (Landscape, Local Green Space and Heritage Impact Study). It was not taken forward to the Preferred Option Sites and Boundaries stage.</p> <p>The Council considers that the plan includes sufficient sustainable and deliverable sites to meet the housing needs for Cheadle. No amendments to the town boundary to accommodate additional allocated sites are required.</p>	No
LPS61	Cheadle	Map A3.1	Mr & Mrs Harrison	Director Ken Wainman Associates Ltd	The Plan is unsound because consultee's land is designated as 'Open Space' on the map, which is incorrect. The land owners are not aware of any change to the use of the land to Open Space.		Yes	No	Yes	The Open Space Study Update Report 2017 identified Cheadle Park Wood under the natural and semi-natural greenspace typology. This was a new site identified by Cheadle Town Council following consultation with them as part of the study and has been included on the policies map. The study update report states that natural and semi-natural greenspace are often highly valued within communities helping to offer access to recreational opportunities and the area is considered to be used by dog walkers. It is considered that the area should be retained as open space.	No
LPS62	Cheadle	Map A3.1	Mr & Mrs Harrison	Director Ken Wainman Associates Ltd	See Comment LPS61, as well as suggested modifications within this comment.	The Open Space zoning on consultee's land in this map, should be removed.	Yes	Yes	Yes	The Open Space Study Update Report 2017 identified Cheadle Park Wood under the natural and semi-natural greenspace typology. This was a new site identified by Cheadle Town Council following consultation with them as part of the study and has been included on the policies map. The study update report states that natural and semi-natural greenspace are often highly valued within communities helping to offer access to recreational opportunities and the area is considered to be	No

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										used by dog walkers. It is considered that the area should be retained as open space.	
LPS125	Cheadle	Map A3.1	Mr T A J Campbell		Comments have already been made about the need to take SHLAA Site CH093 out of the Green Belt and include it within a new town development boundary either as residential land now or as safeguarded land in the future, beyond the plan period. Alternatively, it could be used to meet an identified shortfall in deliverable sites during the plan period.	The map should be amended along the lines suggested (see 'Summary of representation').	Yes	No	Yes	<ul style="list-style-type: none"> CH093 was considered as part of the Green Belt Review Study and the overall impact of development on the purposes of the Green Belt was considered to be moderate. <ul style="list-style-type: none"> Check unrestricted sprawl – contribution Prevent towns merging – limited contribution Safeguarding from encroachment - contribution Setting of towns - contribution The NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances and although concludes that it could be considered for release, exceptional circumstances would need to be justified. The Landscape, Local Green Space and Heritage Impact Study considers the site to be of high landscape sensitivity. Some screening is provided by woodland to the south, particularly when viewed from the A522, however the land rises up from the woodland and visual prominence increases. The site does not fit well within existing settlement pattern and development of the site would adversely affect the existing settlement pattern and edge, and encroach on countryside. It is considered that there are no exceptional circumstances to justify adding CH093 to the Moberley Strategic Development Area. There are other housing sites available in Cheadle not located in the Green Belt. 	No
LPS329	Cheadle Town Centre	Map A3.2	Mr Gez Willard	Willardwillard Ltd	The 'Proposed Town Boundary' should be amended to include a small development site off Park Lane. This is an area that has developed over the last 60 years or so with self build housing. It is close to the town centre and highly sustainable. Given the limited size and nature of the site, it would be wholly suitable for self build and custom build housing in the future. The respondent has attached a slightly revised settlement boundary in Appendix F.					<p>Although the site is in a sustainable location close to the town centre the site lies within the Green Belt. Forming part of Parcel S13 (Green Belt Study) it is considered that it makes a contribution to the Green Belt as the area is vulnerable to urbanisation, given its proximity to Cheadle and also the setting and special character of the town. The land is also identified as important landscape setting to Cheadle in the LCA.</p> <p>The plan can support development requirements for Cheadle without further Green Belt release.</p>	No
LPS14	Alton	Map A4.1	Mr Paul Bain		<p>Additional information added to this representation was received on 1st April 2018.</p> <ul style="list-style-type: none"> The boundary is incorrect because Ordnance Survey maps from 1841, as well as historical literature (see attachment), identify the Nabb Lane residents in 'The Triangle' (see Sketch 1) as owners of fields which were referenced within the Tithe Schedule (a historical record of farming contributions made by local residents to the local Vicar). This demonstrates that the residents of 	Map should be altered to realign the parish boundary to include 'The Triangle', as per Sketch 6.	No	No	No	<p>The Council consults with landowners of potential allocation sites to ascertain their position towards future development, and to clarify land boundaries where appropriate. In other respects the District Council is not responsible for the correct mapping of land boundaries over time, and derives its own publication mapping from Ordnance Survey base.</p> <p>The Council consults with neighbouring planning authorities under its 'duty to cooperate' under the Localism Act. The main issues are set out in the Council's Duty to Cooperate Statement</p>	No

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					<p>Nabb Lane within The Triangle, were part of the parish before, and have been contributing to the parish since 1841 or before.</p> <ul style="list-style-type: none"> Respondent requests that the LPA provide evidence within the Local Plan, to support the boundary alignment. They would also like the LPA to confirm that Historic England were consulted and that historical literature, namely historical maps, were analysed and evaluated. Respondent is highlighting the particular area of 'The Triangle' (boundaries of Nabb Lane and Denstone) when there may be other areas. Respondent also states that the Council has not met its obligation with respect to its 'duty of care', in particular compliance with the 'NPPA' (assume NPPF) that requires the LPA to liaise with other authorities, external organisations and consult local historical literature and organisations to establish correct information. Respondent objects to the Local Plan because it does not meet Spatial Aim SA3 - meeting the needs of our communities. An assumption has been made with respect to the Alton Parish boundary alignment, which is incorrect. As a result, Staffordshire Moorlands are also breaching Spatial Objective SO10 - to deliver sustainable, inclusive, healthy and safe communities. If the incorrect boundary is accepted then the LPA will have no duty to care to improve footpath access as part of the delivery plan. 					which accompanies the submission Local Plan.	
LPS330	Alton	Map A4.1	Mr Gez Willard	Willardwillard Ltd	The allocation of a housing site at 'Capri' is supported.					Support noted.	No
LPS368	Biddulph Moor	Map A4.2	Mr Martin Webb		Respondent considers the amount of housing to be provided within the rural area, and specifically at Biddulph Moor, should be increased. This would necessitate site allocations at Biddulph Moor, which in turn would require amendments to the proposals map at A4.2.			No	No	<p>Most of the site is included in SHLAA site BM013, which is classed as a B site. It was included in the Site Options consultation 2015; a reduced area was included in the Preferred Options Sites and Boundaries consultation 2016. It was not carried forward to the Preferred Options consultation 2017.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends</p>	No

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										<p>set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	
LPS22	Blythe Bridge and Forsbrook	Map A4.3	Mr Brian Sammons		<p>The District Council is of the view that the houses on Blythe Vale would form part of the village Blythe Bridge. This is incorrect because Blythe Vale is quite separate from the village of Blythe Bridge. Blythe Vale also does not form part of Draycott Village to the east.</p> <p>It makes sense to abandon the Blythe Vale site for development as there has been no interest in developing it for employment purposes since its designation many years ago. Abandoning the Blythe Vale site for development would allow for sites to be allocated for housing as part of Blythe Bridge Village, such as those initially suggested in earlier versions of the Plan.</p> <p>Respondent feels the District Council is not considering the views of residents and the Parish Council.</p>	<p>See summary of representation. Respondent feels it would make sense to abandon the Blythe Vale site for development as there has been no interest in developing it for employment purposes since its designation many years ago. Abandoning the Blythe Vale site for development would allow for sites to be allocated for housing as part of Blythe Bridge Village, such as those initially suggested in earlier</p> <p>Respondent feels the District Council is not considering the views of residents and the Parish Council.</p>	No	No	Yes	<p>The site is located to the south of Blythe Bridge. The policy specifies that the residential development should be located to the north of the site which is more closely related to the village of Blythe Bridge and also includes a requirement for development to improve sustainable transport routes and connectivity with Blythe Bridge.</p> <p>A number of sites were dropped from the emerging Local Plan after the previous consultations. Not all sites were required to meet the Districts housing requirements. The sites previously suggested in Blythe Bridge were in the Green Belt and the Council needs to demonstrate exceptional circumstances to justify releasing land from the Green Belt in this case there were considered to be no exceptional circumstances.</p> <p>Previous responses and comments have been taken into account. In determining which sites should be included in the Local Plan, the Council must balance Government planning policy, relevant evidence and public opinion.</p>	No
LPS49	Blythe Bridge and Forsbrook	Map A4.3	Mr William Henry Stanley		<p>Respondent has incapacity and mobility issues and would like to talk to someone in person about their land. They have attached a map.</p>		Yes	Yes	Yes	<p>The omission site includes two SHLAA sites and a number of adjoining fields. All the land is within the green belt.</p> <p>The SHLAA sites are BB045 a small area to the north of New Close Avenue and BB064 to the north of this.</p> <p>BB064 was classed as a C site in the SHLAA. It was considered unsuitable for development as it would significantly extend Blythe Bridge into open countryside and is not well related to the existing settlement form. It was also considered to have an impact on the landscape setting of the area.</p> <p>BB045 was included in the Site Options consultation 2015 as a potential housing option site. It was not carried forward. The Green Belt review recommended the site was not suitable for</p>	No

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										<p>release from the Green Belt. The Landscape & Settlement Character Assessment 2008 identified the site as being important to the setting of Blythe Bridge.</p> <p>This omission site is a large site located to the north east of Blythe Bridge all of which is in the green belt. The Landscape & Settlement Character Assessment 2008 identified the site as being important to the setting of Blyth Bridge.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the Blythe Vale site in Blythe Bridge. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p>	
LPS28	Brown Edge	Map A4.4	Mr Patrick Davies		<p>The residents of Brown Edge (including the Parish Council) would like to see a continuation of written protection (namely Conservation Area status) for a field called War Moors (Grid Ref. SJ907532) included in the Plan. The field has become a wildlife area and marsh.</p> <p>Respondent has attached the front cover of the June 2016 Brown Edge Parish magazine, which shows a map protecting the said land, identified as Visual Open Space and Public Open Space.</p> <p>Respondent makes the following points:</p> <ul style="list-style-type: none"> The 2008 Wardell and Armstrong assessment identified the field in the southern part of the village as Visual Open Space. As far back as the 1998 Plan, the field has 					<p>The field in question was designated as 'Visual Open Space' in the 1998 Local Plan alongside neighbouring land. This designation is no longer recognised in national policy so the Council cannot continue to use it in its new Local Plan. The nearest equivalent designation is 'Local Green Space'. The Council's Landscape, Local Green Space and Heritage Impact Study has assessed all previous Visual Open Space designations against the Local Green Space criteria set out in national planning policy. This field was not considered to meet the criteria so is not proposed to be designated as Local Green Space (ref VOS 26: High Lane - Section B).</p> <p>Brown Edge Parish Council are currently preparing a Neighbourhood Plan. It is understood that the scope of the plan includes consideration of protection of open space in the Parish.</p>	No

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					<p>been referred to as such by SMDC Planners.</p> <ul style="list-style-type: none"> The protection of War Moors, a unique space in the heart of the village, is vital in a time of inappropriate development. The field should be protected forever because it is a Visual Open Space and contains marshes with lots of wildlife. War Moors field is an important habitat for villagers, walkers, the general public and lovers of nature. It could be looked after by Brown Edge Parish Council and the Staffordshire Wildlife Trust when it becomes available for purchase. Respondent makes reference to paras 126-141 (assume 109-125) in the NPPF (Conserving and enhancing the natural environment), paying particular attention to paras 109, 113-114(a) and 125. Respondent makes reference to previous correspondence they sent to the Council on wildlife diversity in the area, including a rare sighting of the Blue Rock Thrush. The respondent references different sightings of different bird species and suggests the Council view the Youtube videos on wildlife sightings in Gwent and Stoke-on-the-Wood, Gloucester. With regard to the above point, respondent states that Kate Dewey from the Staffordshire Wildlife Trust sent an email to Jane Curley from the SMDC Planning Department on 7th June 2017 about their concern for the protection of irreplaceable habitats. Policy DC 3 and para 7.3 (Core Strategy) protect areas from inappropriate development so as to retain the openness of land and its undeveloped appearance. 						
LPS331	Brown Edge	Map A4.4	Mr Gez Willard	Willardwillard Ltd	The village boundary at Brown Edge is supported. There is a suitable development site in the centre of the village off Sytch Road which could accommodate a limited number of houses along with a protected natural zone. A plan showing the outline of this site is attached in Appendix D.					<p>Support noted.</p> <p>The site is part of a larger area of land which was designated as Visual Open Space (VOS) in the Local Plan 1998 (this designation remained in force in the Core Strategy) and SHLAA site BE037 which was assessed as a C site. It was not considered to be suitable for residential development due to amenity value of land as visual open space and 'natural and semi natural open space'.</p> <p>It was included in the Site Options consultation 2015 as a potential open space site and in the Preferred Options Sites & Boundaries consultation 2016 as a Public Open Space and Visual Open Space site.</p> <p>The Landscape, Local Green Space and Heritage Impact Study 2016 reassessed the VOS designations to identify which sites were suitable for LGS designation; green infrastructure based designation or were unsuitable for designation as open space. The Study concluded that the part of the VOS site that</p>	No

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										<p>comprises this omission site was unsuitable for a designation.</p> <p>The Preferred Options consultation 2017 did not take forward the VOS designations instead had a combination of Open Space and LGS designations. In line with the findings of the Landscape, Local Green Space and Heritage Impact Study 2016 the omission site did not have any designation.</p> <p>In the Local Plan the site is unallocated land within the development boundary. Policy H1 supports housing development on sites within the development boundaries. Policies SS8 and H1 allow for residential development through windfalls within the development boundaries of larger villages. Any development would need to be in accord with the Spatial Strategy and other Local Plan policies.</p>	
LPS148	Cheddleton	Map A4.5	Mr F Murray		<p>Respondent objects to the designation of Ox Pasture (west) as Local Green Space. The land at this site conflicts with Paragraph 77 of the NPPF, which sets out the criteria for the designation of Local Green Spaces. Respondent acknowledges that the parcel of land meets bullets 1 to 3 of Paragraph 77 because it is located in close proximity to the community it serves and is not an extensive tract of land. However, they disagree with the conclusions reached in the recent Local Green Space consultation regarding the perceived local significance of the land.</p> <p>There are two tests within the second bullet point of Paragraph 77 of the NPPF, which have to be addressed. Firstly, the land must be “demonstrably special to a local community”. Secondly, it must be shown that the land holds a particular local significance. With regard to the first test, the previous VOS Assessment carried out on behalf of the Local Authority does not identify how or why the land is demonstrably special to the local community, nor is there any commentary or discussion on this point within the Plan. As such, the parcel of land fails to meet the requirements of Paragraph 77. With regard to the second test, the VOS Assessment describes the land as having “very attractive views from footpath on southern boundary out towards wider countryside [including church and roaches]. Tranquil, wildlife value in hedgerows.”</p> <p>The respondent makes the following points:</p> <ul style="list-style-type: none"> The attractive views identified within the VOS Assessment were not identified as ‘Significant Views’ in the Landscape and Settlement Character Assessment for Cheddleton. This calls into question the significance of the views. The footpath referred to along the southern boundary of the site is not accessible to the public. It is not a designated public footpath as is within private ownership having been purchased by respondent 10 years ago. Therefore, there is no right to use the footpath, and it is not maintained as such by the respondent. The “very attractive views” from the 	The parcel of land at Ox Pasture (west) should not be designated as a Local Green Space, and should be removed from Appendix 10 and the proposals map.	Yes	No	Yes	<p>Ox Pasture (west) is a designated Visual Open Space (VOS) within the existing 1998 Local Plan. The 2016 Study recommended that the existing VOS designation be replaced with the NPPF compliant Local Green Space (LGS) designation. Accordingly, the 2016 Study assessed the VOS designations against the LGS criteria as set out within the NPPF.</p> <p>The Site is demonstrably special to the local community for the reasons set out within the 2016 Study (high tranquillity and visual amenity value, and some ecological and recreational value), and as a consequence holds a particular local significance.</p> <p>The significant views identified on the settlement constraints plans within the Landscape & Settlement Character Assessment (LSCA) do not comprise all views within a settlement; the LSCA acknowledged the value of the views across the site through its designation as VOS. The justification for the designation of land as a VOS included allowing the public to enjoy significant internal and external views across an open area.</p> <p>Although the footpath is not currently a designated right of way, it is accessible to the public, as verified by a site visit undertaken on 21st May 2018. The footpath appears to be in regular use as it is well worn, and there is evidence that it has been in use for a considerable amount of time, including the following:</p> <ul style="list-style-type: none"> It is marked as a footpath on OS Plans for the area dating as far back as 1937, and as recently as 1990; The boundaries of adjacent properties have been constructed to ensure the protection of its alignment; There is also a post and wire fence within the site, which is set back from the edge of the properties to the south and corresponds with the northern edge of the alignment of the footpath; and The construction of the stone wall and step at the eastern junction of the footpath (with Footpath Cheddleton 1R/2575) indicates that access to the 	No

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					<p>footpath on the southern boundary, as identified in the VOS Assessment, are therefore not publicly available. Consequently, the proposals fail to meet the second bullet point of Paragraph 77 of the NPPF.</p> <p>In support of the above, an extract from the Staffordshire County Council's Rights of Way database confirms that the only public footpath in the vicinity of the site runs along the site's eastern boundary. From this defined public footpath however, there are no "very attractive views" as the footpath is sunken and enclosed on both sides by mature vegetation. Furthermore, the land has no historical significance, nor any recreational value as it is within private ownership. Lastly, the wildlife value of the site is not derived from the land itself, which is regularly grazed.</p>					<p>footpath has existed for a considerable period of time.</p> <p>On the basis that the footpath has been used by the public for a considerable length of time, and is clearly still used, it is considered that the visual amenity value identified for the site within the 2016 Study is valid.</p> <p>In addition, other factors which contribute to the site meeting the criteria for designation as a LGS (high tranquillity and some ecological value) are valid whether the footpath is accessible or not. As stated within the NPPG, land can "be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty)."</p> <p>Full details can be found in the evidence document entitled: Landscape, Local Green Space & Heritage Impact Study: Review of Representations May 2018 which includes photographs of the footpath described above.</p>	
LPS332	Cheddleton	Map A4.5	Mr Gez Willard	Willardwillard Ltd	<p>The respondent does not support the 'Proposed Village Boundary'. It should be extended at the southern end of the village to support a development site (off Cheadle Road) first suggested by the Council in a previous draft plan in 2016. This site could provide for around 96 units and is free from any technical or legal impediment to development. It could be used to meet part any housing shortfall. A plan showing the outline of this site is attached in Appendix C.</p>					<p>CD002 and CD003 are within the green belt. They were in the Site Options consultation 2015 and the Preferred Options Sites and Boundaries consultation 2016 but were not taken forward.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of this site from the green belt.</p> <p>An outline planning application has been submitted on</p>	No

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										15/1/2018 for residential development on this site comprising 65 dwellings. The decision is pending. Application number SMDC/2018/0004.	
LPS122	Endon	Map A4.6	Ms Laura Clarke		No comment. Respondent does, however, mark the Plan as legally compliant and in accordance with the Duty to Co-operate.		Yes	No	Yes	<p>Support noted.</p> <p>The site is allocated for residential development - the nature and type of the development is not specified. Policy H 1 of the Local Plan seeks to ensure there is an appropriate range and type of houses is provided that meets identified needs arising from changes to the population structure including special needs for the elderly. All new dwellings should provide flexible accommodation that is capable of future adaptation. It is therefore not considered necessary to restrict this site for elderly accommodation.</p> <p>The Highways Authority considers Brookfield Avenue can satisfactorily accommodate additional traffic. Brookfield Avenue is an existing residential road. It has parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but they consider this will be acceptable and appropriate. The Highways Authority advises that the site is developable subject to adequate visibility and access improvements. The inclusion of the large house on the corner is a positive – Stoney Lane can be widened and made up to adoptable standard to provide a good access. Visibility at the access on to Brookfield Avenue is good.</p> <p>The Environment Agency did not raise any site specific issues. Staffordshire County Council as LLFA identified potential flood risk issues, recommend flood risk assessment and early engagement with County Council. Policy SD 5 expects proposals to manage surface water run off; and integrate sustainable drainage features ("SuDS") into layouts, as required by the Flood and Water Management Act.</p> <p>The site was identified as Visual Open Space in the Local Plan 1998. The new Local Plan is not proposing to carry forward the VOS designations where appropriate it will designate sites as local green space. The 2008 Landscape and Settlement Character Assessment reviewed the VOS designations and recommended that this site was not retained as VOS.</p> <p>The site is within the village boundary and is therefore considered suitable as a potential housing option.</p> <p>Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 seeks to ensure new development should protect the amenity of an area and residential amenity.</p>	No
LPS115	Werrington and Cellarhead	Map A4.11	Manjit		Respondent is not happy that the land surrounding their home at Big Ash Bank has been 'washed over' by the Green Belt, with their					The omission site WE027 is in the green belt, the Local Plan proposes no changes to this designation. It was assessed as a B	No

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			Singh		<p>house incorporated within it. This is despite the fact there were agricultural buildings by their house. As such, the respondent will not be able to undertake any infill development nor extend their house as they had planned.</p> <p>The respondent has had many discussions with the staff at SMDC regarding their concerns, and had even discussed the possibility of having a pocket of housing on a large part of the 16 acres of land they own.</p> <p>The respondent will be disappointed if they are not allowed 'high architectural value and quality' housing development on their own land, within the Green Belt. This is because they feel that development of their land would help preserve the type of housing quality and home ownership that benefits this part of the Moorlands. The respondent believes that housing design should: (1) be truly outstanding and innovative; (2) help to raise standards of design in the Borough; (3) reflect the highest standards in architecture; (4) significantly enhance its immediate setting around their land; and (5) be sensitive to the defining characteristics of the local area.</p> <p>The respondent requests that the Council seriously consider the proposal to incorporate their land within the Green Belt so that they can begin dialogue with the Council for a housing development on their land.</p>					<p>site in the SHLAA. It was included in the Site Options consultation 2015 and the Preferred Options Sites and Boundaries consultation 2016. The site contains some existing development. The NPPF allows for the development of brownfield sites in defined circumstances.</p> <p>The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The distribution of development is broadly in line with the Core Strategy with minor adjustments to the Rural Areas and Cheadle, which reflects green belt constraints and the availability of suitable sites outside the green belt around Cheadle. The net housing requirement will be met from site allocations set out in policy H2 and windfall allowances for each area based on past trends set out in policy SS4. Policies SS 8, SS 9 and H1 allow for residential development in defined circumstances in the larger villages and modest growth on the smaller villages. Development should be of an appropriate scale for the Spatial Strategy and where applicable in accord with national green belt policy.</p> <p>The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances justify the release of this site from the green belt.</p> <p>The Environment Agency identified potential flooding issues for this and the adjoining site WE013 in their comments to the Preferred Options Sites and Boundaries consultation 2016 and that the flood risk to the site should be quantified as it may affect the deliverability of the site. Staffordshire Lead Local Flood Authority have it on their records as a 'Flooding Hotspot'</p>	
LPS119	Werrington and Cellarhead	Map A4.11	Mr Paul Dean		<p>WE003 and WE052 are public land within the Green Belt, but it is current Government policy to sell this land to build on. The local Conservative Werrington Parish and District Councillors have represented Policy DSR4 on behalf of residents but have decided to ignore those who live in the Windmill Ward and who do not want to build homes on the grounds of HM Werrington Prison.</p> <p>The Councillors chose to represent the residents around these sites (WE042 and WE043) and have selected unsuitable sites of WE003 and WE052 – they have ignored the views of residents in the Windmill Ward. The respondent refers to HMP Lancaster Farm as an example of homes built near a prison but not within its grounds as this example has a road and grassed/wooded area</p>	The respondent has proposed the Council consider the following modifications to the Local plan. The respondent outright rejects the idea of development on an active Prison facility and the Council should reconsider as the only time building on the grounds of HM Werrington Prison should be considered is if the actual facility itself is	No	No	No	<p>The site policy DSR 4 states any development of this site would be required to submit a noise impact assessment to consider the effect of the YOI and any mitigation measures. Issues such as overlooking and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Policy DC1 relates to design considerations and seeks to ensure new development protects residential amenity.</p> <p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with</p>	No

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					<p>providing an adequate buffer zone. To build homes within the grounds of HM Werrington Prison is not a sound plan and should have never been proposed and included. The inclusion of Policy DSR4 has resulted in Nimbyism. HM Werrington Prison facility itself is in hollow and does not impinge on the spectacular views. To build on Site WE052 on the gradient in front of the prison is undignified and not respecting the prison inmates who can see people living in freedom.</p> <p><i>(Please note that this representation has been redacted because the matter raised is not relevant to the process and there is a separate procedure for raising concerns regarding the conduct of Councillors.)</i></p>	<p>closed down as its footprint is down in the hollow and does not have a visual impact and some of the old buildings can be converted to flats. The Council should consider permanently designating sites WE003 and WE052 as local green space within the Green Belt and should never be built on and the spectacular views should be left to future generations. Since the 1980s there have been no developments in the Washerwall Ward but many since the 1990s in the Windmill Ward. In the decency of fairness the Local Plan for the whole village of Werrington and Cellarhead should be dispersed and the Council should use the mothballed sites of WE042 and WE043 to build 50 homes on and then use the lower portion of Meigh Road playing fields to 25 homes on. For the reason that Meigh Road is a very wide road unlike in the Windmill Ward and the access points, Tregaron Court and Langton Court are suitable to access sites WE042 and WE043 and were left this way as future developments in this location had been planned for.</p>			<p>the Council's adopted Statement of Community Involvement. These are matters covered by the Government's soundness tests which will be considered at examination by Government Inspector. All stages of the proposed Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p> <p>Resident's views have been sought as part of various public consultations. The Council must balance this evidence against all the other evidence relating to proposed sites and reach a decision on which sites to include as development sites in the Local Plan.</p> <p>Responses to the comments received to previous rounds of consultation have been reported to the Council Assembly and are available on the Council's website.</p> <p>The Local Plan does not propose a residential allocation on WE042 and WE043. The Local Plan allocates sites for residential development in order to meet the District's housing requirement. The distribution of development is detailed in policy SS3, development will be located in accordance with Spatial Strategy across the towns and Rural Areas. The Rural Areas is heavily constrained by the green belt. The Local Plan allocates six sites for residential development in the Rural Areas, including the site at Werrington. In line with government policy the Local Plan only seeks to remove land from the green belt for residential development where exceptional circumstances exist. The NPPF states that once established Green Belt boundaries should only be altered in exceptional circumstances and the Housing White Paper Fixing our Broken Housing Market (February 2017) reiterates this commitment. It is considered there are no exceptional circumstances to justify the release of the sites WE042 and WE043 from the green belt.</p>		
LPS129	Werrington and Cellarhead	Map A4.11	ms Elaine Ungut		<p>Respondent expresses concern over the flawed consultation process which moved, as it proceeded, away from the original desires of a representative sample of Werrington people in a ranking exercise. The residents all cooperated in good faith but now believe two unsuitable sites have been included in the final Local Plan in Werrington. The Council has chosen the easiest option which is to appease political masters, who wish to sell land to the highest bidder. Passing a Localism Act does not mean that locals have had their say. Local Plan should go back to the drawing board.</p> <p>Developing housing adjacent to a prison (despite the presence of a buffer zone) will not protect the wellbeing of local residents. The buffer zone is currently Green Belt which should not be developed. Furthermore, the A52 will not cope with the development. Issues with access from Salters Lane. Where are the</p>	<p>The whole Local Plan needs to be reassessed, and the actions of Councillors investigated. The respondent would also like to know whether conflicts of interest have been declared at various stages in the process.</p> <p>SMDC should not accept what the Government expects. They should instead study where existing residential development is, around Meigh Road. The access points to Sites WE042</p>	No	No	No	<p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. These are matters covered by the Government's soundness tests which will be considered at examination by Government Inspector. All stages of the proposed Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p> <p>Residents views have been sought as part of various public consultations. The Council must balance this evidence against all the other evidence relating to proposed sites and reach a decision on which sites to include as development sites in the Local Plan.</p>	No

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					<p>public services can they cope. Loss of view from a public viewpoint has not been considered. Meigh Road football ground (closed) can take some houses. Other sites, namely WE042 and WE043 were identified and ignored on spurious grounds – those of access and being an important landscape – which do not seem to apply equally to other sites, namely WE003 and WE052.</p> <p><i>(Please note that the attachment to this representation has been redacted because the matter raised is not relevant to the process and there is a separate procedure for raising concerns regarding the conduct of Councillors.)</i></p>	<p>and WE043 are as wide as the access points to other existing developments (e.g. at Brentwood Road and Scholars Way). It therefore appears that access is only a problem when it suits. The land at Meigh Road playing fields is a nice public open space for dog walkers, and access could be easily made for houses. A children's play area could still be maintained</p> <p>The respondent requests that the Council re-read the draft results of the Sites consultation, for WE003 and WE052.</p> <p>Dispersal of development is the only fair and equitable response as it would ease traffic flow and not cause congestion at the small crossroads of the A52 with Washerwall Lane and Salters Lane. Traffic already uses Chatsworth Drive to avoid the A52 and its junction with Washerwall, so to bring all the cars connected with these new homes onto the A52 would only compound the problem.</p>			<p>Responses to the comments received to previous rounds of consultation have been reported to the Council Assembly and are available on the Council's website.</p> <p>The Council has considered the alternative sites suggested in the responses to the previous consultations and where appropriate has included the additional sites in the proposed site allocations in the Local Plan.</p> <p>The site policy DSR4 references contributions towards infrastructure. New development is the main way to deliver new or improved infrastructure/local facilities e.g. more residents may support more local facilities, shops and services. Some infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas. National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan. The Council is working with the Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.</p> <p>The Council has undertaken a Landscape, Local Green Space and Heritage Impact Study 2016 to form part of the evidence base to support the Local Plan and assess the potential landscape and heritage impacts of the development allocations. It found that site WE003 is of medium landscape sensitivity. It recognised it forms a gap with the existing development and fits well within the existing settlement pattern. It recommended landscape mitigation on the south-eastern and southern boundaries. Site WE052 has low visual prominence and fits well within the settlement form, as it comprises a gap in development and is of low landscape sensitivity The Green Belt Review Study recommended that part of WE003 should stay as open space to preserve openness. The site policy DSR 4 requires a landscaping plan to address recommendations set out in the Landscape, Local Green Space and Heritage Impact Study and an area of WE003 is to remain open inline with the Green Belt Review Study.</p> <p>Policy DSR 4 requires a traffic assessment to consider the impact of the traffic on Ashbank Road and for details of the access to be provided inline with the Highway Authority requirements.</p>		
LPS486	Werrington and Cellarhead	Map A4.11	Mr Grant Anderson	Fradley Estates	Fradley Estates (FE) objects to the inclusion of its land North of Cotehill Road, Werrington, as Local Green Space. FE reference Paragraph 77 of the NPPF and the Inspector's Report from the Blackwell Neighbourhood Plan 2014-2026 (attached), highlighting the fact that Local Green Space must be "demonstrably special"	FE's site (land North of Cotehill Road, Werrington) should be deleted as a Local Green Space proposal.		No		The space in question was designated as 'Visual Open Space' in the 1998 Local Plan. This designation is no longer recognised in national policy so the Council cannot continue to use it in its new Local Plan. The nearest equivalent designation is 'Local Green Space'. The Council's Landscape, Local Green Space and	No

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					<p>and of "particular local significance" to be designated. The Council's Landscape, Local Green Space and Heritage Impact Study looked at potential candidates for designation as Local Green Space, which included FE's land to the North of Cotehill Road. The assessment considered that FE's land at Cotehill Road met the criteria highlighted in Paragraph 77 of the NPPF, stating that it has "...recreational value, clear paths, three points of public access. Tranquil away from roads, some views out to north. Wildlife value in overgrown high level". Fradley Estates state, however, that this assessment is incorrect.</p> <p>It is assumed that FE's land has recreational value by virtue of its public use. The land is, however, privately owned land. The public do not have the right to use the land for recreational use. The owner has for a number of years, taken a number of steps to prevent third party/public rights being established over the land. These include submitting a Section 31 deposit of statement and map, under the Highways Act to prevent the establishment of public footpaths by way of presumed dedication.</p> <p>In terms of the characteristics of tranquillity and views, the land is in the middle of an established housing estate and adjoins another parcel of open land. There is nothing demonstrably special as to its tranquillity or its views which justify a local green space designation. FE believe that this land could be developed to make a contribution to meeting the housing needs of the local area. The site is clearly in a sustainable location and well placed to make a positive contribution to meeting the future housing needs of Werrington.</p> <p>In relation to wildlife, again there is nothing demonstrably special about the wildlife present at the site. The Council's assessment provides no justification other than a short bald assertion that there is some wildlife value in overgrown areas. The land is not dissimilar to many others.</p>					Heritage Impact Study has assessed all previous Visual Open Space designations against the Local Green Space criteria set out in national planning policy. This field was considered to meet the criteria so is proposed to be designated as Local Green Space (ref VOS 35: North of Cotehill Road).	
LPS386	Leekbrook	Map A5.17	Wainhomes (North West) Limited		<p>Under the draft Submission Version, Leekbrook would effectively be washed over as countryside where only 'limited development' would be allowed. This is considered unjustified as set out in representations to LPS414, LPS417 and LPS418. Leekbrook should be included as part of Leek in the settlement hierarchy. Without prejudice to those submissions, the respondent suggests that as a minimum Leekbrook should be upgraded in the settlement hierarchy to a larger village. Under either scenario, it is suggested Leekbrook would benefit from a development boundary.</p> <p>Additionally, the respondent's site at Wardle Gardens should not be excluded from the development boundary. The development boundary would also need to be extended to include the draft allocations proposed in the Submission Version (identified as 'Leek EM2' and 'ADD09' on Map A5.17)</p>			No	No	<p>Leekbrook was identified as a smaller village in the Core Strategy. There is no material evidence to indicate that the settlement has become more sustainable for housing development since 2014.</p> <p>Leekbrook's contribution towards Leek's employment land requirement was a principle agreed in the Core Strategy. Industrial estates are often peripheral to the towns that they serve as is the case with the Leekbrook allocations.</p> <p>The supporting text to Policy SS2 explains how the spatial strategy maintains a settlement hierarchy based on Core Strategy Policies SS6/6A/6B/6C so as to create sustainable, self supporting communities. This categorisation of villages was based on their population, services, facilities and capacity for development, and was found sound at Core Strategy examination.</p> <p>The northern employment element of the 2003 mixed use</p>	No

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										approval may have expired without submission of reserved matters. However, the site is still considered an employment site by virtue of E3 of the Local Plan. Pol E3 provides for the protection of existing employment areas across the District (that meet the bullet criteria). This would include sites in the countryside or smaller villages beyond development boundaries. In the case of development proposals on existing Pol E3 sites in the countryside or smaller villages, wider Local Plan Spatial Strategy, design and landscape policies would continue to apply in determination.	
LPS32	Meerbrook	Map A5.20	Mr Ian Fullilove	Policy Planner Peak District National Park Authority	This map should make clear what is meant by 'Local Plan Boundary'.	Stating which planning authority covers which side of the boundary in this map would be helpful to developers and officers.	No			Update Policies Maps to identify local planning authorities on other side of Local Plan boundary.	Yes
LPS77		Map A5.23	Dr Graham Betton		Removing the '1998 Local Plan Village Boundary' from the map will encourage developers to submit plans for the development of a larger part of the village, particularly to the east of the A523 outside the Green Belt. The A523 and main road (Leek Old Road) represent the edge of the Green Belt and split the village in half. The current boundary should be retained, and the Council should consider infill development on a case by case basis. The development boundary has been agreed by the parish council and infill development is feasible.	Remove the wording from the map that says the development boundary will be removed.	No	No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	No

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LPS36	Whiston	Map A5.27	Mr James Green		<p>Removing the Whiston '1998 Local Plan Village Boundary' and the boundaries of all other smaller villages within Staffordshire Moorlands undermines and effectively removes the protection of some important policies contained within the current Core Strategy.</p> <p>Respondent is of the view that the Plan is neither sound nor legal because it effectively gives a green light to increased, unsustainable and uncontrolled development in rural areas.</p>	<p>The Whiston '1998 Local Plan Village Boundary' should be retained but updated to include current and approved developments such as the Copper Works. This will ensure that future potential developments can be controlled to a greater extent regarding their locations.</p>	No	No	No	<p>Of the 29 Smaller Villages identified in Policy SS9, 18 do not have a boundary identified on the 1998 Local Plan Proposals Map. Accordingly, 11 village boundaries are proposed to be removed. The new Local Plan seeks to ensure that all Smaller Villages are managed in the same way, subject to differences where green belt is applicable.</p> <p>However, of the 11 village boundaries to be removed, 4 villages are inset within the green belt (not "washed over"). The green belt boundary is not proposed to be amended in these villages and so the green belt boundary will remain as identified in the 1998 and Submission Version Policies Maps.</p> <p>A criteria based policy approach is proposed for the Smaller Villages rather than infill boundaries as previously suggested. This principle is set out in Policy SS9 (Smaller Villages) with the detail provided in Policy H1 (New Housing Development). H1 supports limited infill development of an appropriate scale and character for the Spatial Strategy. It also requires that development is well related to the existing pattern of development, will not create or add to ribbon development or lead to a sporadic pattern of development. In the green belt, NPPF policy in respect of Green Belt will also apply.</p> <p>Whilst the 2015 Site Options Consultation and 2016 Preferred Options Sites and Boundaries Consultation document did identify draft infill boundaries for the Smaller Villages, this approach was replaced by the criteria based policy approach in the 2017 Preferred Options Local Plan and subsequently the 2018 Submission Version. Consultation feedback on the appropriateness of the draft infill boundaries was inconclusive. However, feedback did indicate that a flexible infill approach to development in the Smaller Villages was suitable. This approach allows the Council to carefully consider the impact of infill proposals at the application stage when more details are available regarding the scale and visual impact of development are known. This will enable the sustainable organic growth of the Smaller Villages and provide a clear policy to manage such development.</p>	No
LPS173	Blythe Business Park, Cresswell	Map A6.1	Jacque Leach		<p>This policy is unsound. The support received for the expansion of the Blythe Business Park is not justified in the supporting text. Furthermore, evidence indicates that there is 70ha of employment land available in the rural areas (over 56ha with planning permission) and the location of the site is within a Special Landscape Area. Additionally, there is no evidence from before this examination, to indicate that proximity to and the potential impact on the neighbouring settlement of Cresswell, has been taken into account. The known toxicity of industrial waste has also not been acknowledged as part of the process of determining whether the principle of expansion is feasible or desirable.</p> <p>The Planning Committee removed the expansion of the Blythe Business Park from the Core Strategy but then passed it despite</p>	<p>The Blythe Business Park application should be revoked.</p> <p>The SMDC planning officer recommended refusal for the Blythe Business Park application, one of the reasons being the settlement hierarchy. The Planning Committee ignored this and the application was passed. The Government Ombudsman said that this was the worst case they had seen in 25 years of service</p>	No	No	No	<p>The site in question has been through due process and have the benefit of planning consent. The Local Plan takes account of all sites with planning consent in terms of commitments.</p> <p>The Council must conduct public consultation concerning its emerging Local Plan as set out in the Local Plan regulations (or exceeding these requirements); and in also in accordance with the Council's adopted Statement of Community Involvement. All stages of the Local Plan (including consultations) must be agreed by the elected Council Assembly; and all meetings of the Council Assembly are open to the public.</p>	No

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					<p>recommendation for refusal from the case officer.</p> <p>The police investigation continues. The residents have not been listened to; especially those that worked at Blythe Colour Works and know what substances have been buried. A lot of toxic waste was buried in unregistered locations. The residents would really like some information from the Environment Officer Dr Danny McCrory before any work begins. The residents have contacted the Health and Safety Executive but they said that the residents must contact them when work commences.</p>	<p>but nothing could be done until the police investigation had concluded. Several members of the Planning Committee have been investigated. The Local Plan cannot be accepted until all legal procedures are followed. VVSM wanted to take this to Judicial Review and they had the support of a barrister but they could not continue because they hadn't raised the £40,000 required (they'd raised and spent £15,000).</p>					
LPS333	Appendix 7 - Housing Trajectory		Mr Gez Willard	Willardwillard Ltd	<p>The chart illustrates the Council's confidence that housing completions will start to increase dramatically. However, the Plan gives little reason to believe that the trajectory outlined will be delivered.</p>					<p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS365	Appendix 7 - Housing Trajectory		Mr Paul Hill	RPS Planning & Development	<p>RPS support the provision of a Housing Trajectory in the Plan. However, the trajectory needs to be more detailed to provide a clear indication of how much housing growth is estimated from the strategic sites on an annual basis. Such an approach is critical to the assessments of both a five year land supply and the ability of the Council to maintain that supply over the whole plan period.</p>	<p>The trajectory needs to be more detailed to provide a clear indication of how much housing growth is estimated from the strategic sites on an annual basis. Such an approach is critical to assessments of both a 5 year land supply and the ability of the Council to maintain that supply over the whole plan period.</p>		No		<p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS439	Appendix 7 - Housing Trajectory		Richard House	Gladman	<p>This trajectory contains insufficient detail to enable a robust analysis to be undertaken, particularly in respect of the assumptions that have been used in projecting completions for the period 2017/18 to 2022/23. Gladman is therefore not able to ascertain whether the Plan will deliver a five year supply of housing land from adoption. Gladman request that SMDC use a format for its trajectory as produced by other Councils, such as those at Annex A to the North Devon and Torridge Core Strategy or Appendix B to the North Devon and Torridge Local Plan Examination document EC06.</p>					<p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No
LPS546	Appendix 7 - Housing Trajectory		Mr Martin Webb		<p>The respondent argues the Council has a significant shortfall in their 5 year housing supply which equates to 1.99 years, substantially below the Framework's minimum requirement of a 5 year housing supply. Due to a lack of evidence, it is considered the Council's housing trajectory at Appendix 7 of the Submission Version is undeliverable and the supply would be less than 5 years, even with the inclusion of draft allocations. It is also argued there is a lack of evidence to the housing land supply and the</p>			No	No	<p>The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.</p>	No

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					housing trajectory over the plan period.						
LPS554	Appendix 7 - Housing Trajectory		Wainhomes (North West) Limited		Due to a lack of evidence, it is considered the Council's housing trajectory at Appendix 7 of the Submission Version is undeliverable and the supply would be less than 5 years.			No	No	The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	No
LPS472	Appendix 7 - Housing Trajectory		Renew Land Development Ltd.		This representation is submitted on behalf of the landowner Renew Land Developments Limited, who are promoting the development of land at: (1) Newpool Farm, Newpool Road, Knypersley, Biddulph; and (2) Hurst Quarry, Hurst Road, Biddulph. The housing trajectory does not appear to be supported by an up to date SHLAA assessment. The SHLAA Assessment that the Council has is dated 2015 and is three years old. However, national policy requires such assessments to be updated annually. Furthermore, the SHLAA does not provide a detailed analysis of build out rates for large and small sites depending upon whether they have full or outline permission, or whether there is a resolution to grant planning permission. Nor does the SHLAA contain an analysis of build out rates and lead in times for sites that are currently under construction.		Yes	No	Yes	The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	No
LPS467	Appendix 7 - Housing Trajectory		Mr Mark Bullock		This representation is submitted on behalf of the landowner of Park Lane, Cheadle (Site CH165) who objects to this policy. The housing trajectory does not appear to be supported by an up to date SHLAA assessment. The SHLAA Assessment that the Council has is dated 2015 and is three years old. However, national policy requires such assessments to be updated annually. Furthermore, the SHLAA does not provide a detailed analysis of build out rates for large and small sites depending upon whether they have full or outline permission, or whether there is a resolution to grant planning permission. Nor does the SHLAA contain an analysis of build out rates and lead in times for sites that are currently under construction.		Yes	No	Yes	The housing trajectory is based on an analysis of sites that have planning permission, allocated sites, windfall allowance and a Peak District National Park allowance. It assumes built out rates based on the size of site and number of dwellings which is supported by the residential appraisal assumptions in the Council's Viability Study. More detail on the housing trajectory will be provided within a Topic Paper.	No
LPS147	Local Green Spaces	Table A10.1	Mr F Murray		<p>Respondent objects to the designation of Ox Pasture (west) as Local Green Space. The land at this site conflicts with Paragraph 77 of the NPPF, which sets out the criteria for the designation of Local Green Spaces. Respondent acknowledges that the parcel of land meets bullets 1 to 3 of Paragraph 77 because it is located in close proximity to the community it serves and is not an extensive tract of land. However, they disagree with the conclusions reached in the recent Local Green Space consultation regarding the perceived local significance of the land.</p> <p>There are two tests within the second bullet point of Paragraph 77 of the NPPF, which have to be addressed. Firstly, the land must be "demonstrably special to a local community". Secondly, it must be shown that the land holds a particular local significance. With regard to the first test, the previous VOS Assessment carried out on behalf of the Local Authority does not identify how or why the land is demonstrably special to the local community, nor is there any commentary or discussion on this point within the Plan. As such, the parcel of land fails to meet the requirements of</p>	The parcel of land at Ox Pasture (west) should not be designated as a Local Green Space, and should be removed from Appendix 10 and the proposals map.	Yes	No	Yes	<p>Ox Pasture (west) is a designated Visual Open Space (VOS) within the existing 1998 Local Plan. The 2016 Study recommended that the existing VOS designation be replaced with the NPPF compliant Local Green Space (LGS) designation. Accordingly, the 2016 Study assessed the VOS designations against the LGS criteria as set out within the NPPF.</p> <p>The Site is demonstrably special to the local community for the reasons set out within the 2016 Study (high tranquillity and visual amenity value, and some ecological and recreational value), and as a consequence holds a particular local significance.</p> <p>The significant views identified on the settlement constraints plans within the Landscape & Settlement Character Assessment (LSCA) do not comprise all views within a settlement; the LSCA acknowledged the value of the views across the site through its designation as VOS. The justification for the designation of land as a VOS included allowing the public to enjoy significant</p>	No

ID	Title	Number	Full Name	Organisation Details	Summary of representation	Summary of modification	Complies with the Duty to Co-operate?	Sound?	Legally compliant?	Officer response	Modification recommended by officer
					<p>Paragraph 77. With regard to the second test, the VOS Assessment describes the land as having “very attractive views from footpath on southern boundary out towards wider countryside [including church and roaches]. Tranquil, wildlife value in hedgerows.”</p> <p>The respondent makes the following points:</p> <ul style="list-style-type: none"> • The attractive views identified within the VOS Assessment were not identified as ‘Significant Views’ in the Landscape and Settlement Character Assessment for Cheddleton. This calls into question the significance of the views. • The footpath referred to along the southern boundary of the site is not accessible to the public. It is not a designated public footpath as is within private ownership having been purchased by respondent 10 years ago. Therefore, there is no right to use the footpath, and it is not maintained as such by the respondent. The “very attractive views” from the footpath on the southern boundary, as identified in the VOS Assessment, are therefore not publicly available. Consequently, the proposals fail to meet the second bullet point of Paragraph 77 of the NPPF. <p>In support of the above, an extract from the Staffordshire County Council’s Rights of Way database confirms that the only public footpath in the vicinity of the site runs along the site’s eastern boundary. From this defined public footpath however, there are no “very attractive views” as the footpath is sunken and enclosed on both sides by mature vegetation. Furthermore, the land has no historical significance, nor any recreational value as it is within private ownership. Lastly, the wildlife value of the site is not derived from the land itself, which is regularly grazed.</p>					<p>internal and external views across an open area.</p> <p>Although the footpath is not currently a designated right of way, it is accessible to the public, as verified by a site visit undertaken on 21st May 2018. The footpath appears to be in regular use as it is well worn, and there is evidence that it has been in use for a considerable amount of time, including the following:</p> <ul style="list-style-type: none"> • It is marked as a footpath on OS Plans for the area dating as far back as 1937, and as recently as 1990; • The boundaries of adjacent properties have been constructed to ensure the protection of its alignment; • There is also a post and wire fence within the site, which is set back from the edge of the properties to the south and corresponds with the northern edge of the alignment of the footpath; and • The construction of the stone wall and step at the eastern junction of the footpath (with Footpath Cheddleton 1R/2575) indicates that access to the footpath has existed for a considerable period of time. <p>On the basis that the footpath has been used by the public for a considerable length of time, and is clearly still used, it is considered that the visual amenity value identified for the site within the 2016 Study is valid.</p> <p>In addition, other factors which contribute to the site meeting the criteria for designation as a LGS (high tranquillity and some ecological value) are valid whether the footpath is accessible or not. As stated within the NPPG, land can “be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty).”</p> <p>Full details can be found in the evidence document entitled: Landscape, Local Green Space & Heritage Impact Study: Review of Representations May 2018 which includes photographs of the footpath described above.</p>	
LPS485	Local Green Spaces	Table A10.1	Mr Grant Anderson	Fradley Estates	<p>Fradley Estates (FE) objects to the inclusion of its land North of Cotehill Road, Werrington (Ref. 35), as Local Green Space. FE reference Paragraph 77 of the NPPF and the Inspector’s Report from the Blackwell Neighbourhood Plan 2014-2026 (attached), highlighting the fact that Local Green Space must be “demonstrably special” and of “particular local significance” to be designated. The Council’s Landscape, Local Green Space and Heritage Impact Study looked at potential candidates for designation as Local Green Space, which included FE’s land to the North of Cotehill Road. The assessment considered that FE’s land at Cotehill Road met the criteria highlighted in Paragraph 77 of the NPPF, stating that it has “...recreational value, clear paths, three points of public access. Tranquil away from roads, some views out to north. Wildlife value in overgrown high level”.</p>	<p>FE’s site (land North of Cotehill Road, Werrington) should be deleted as a Local Green Space proposal.</p>		No		<p>The space in question was designated as ‘Visual Open Space’ in the 1998 Local Plan. This designation is no longer recognised in national policy so the Council cannot continue to use it in its new Local Plan. The nearest equivalent designation is ‘Local Green Space’. The Council’s Landscape, Local Green Space and Heritage Impact Study has assessed all previous Visual Open Space designations against the Local Green Space criteria set out in national planning policy. This field was considered to meet the criteria so is proposed to be designated as Local Green Space (ref VOS 35: North of Cotehill Road).</p>	No

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					<p>Fradley Estates state, however, that this assessment is incorrect.</p> <p>It is assumed that FE's land has recreational value by virtue of its public use. The land is, however, privately owned land. The public do not have the right to use the land for recreational use. The owner has for a number of years, taken a number of steps to prevent third party/public rights being established over the land. These include submitting a Section 31 deposit of statement and map, under the Highways Act to prevent the establishment of public footpaths by way of presumed dedication.</p> <p>In terms of the characteristics of tranquillity and views, the land is in the middle of an established housing estate and adjoins another parcel of open land. There is nothing demonstrably special as to its tranquillity or its views which justify a local green space designation. FE believe that this land could be developed to make a contribution to meeting the housing needs of the local area. The site is clearly in a sustainable location and well placed to make a positive contribution to meeting the future housing needs of Werrington.</p> <p>In relation to wildlife, again there is nothing demonstrably special about the wildlife present at the site. The Council's assessment provides no justification other than a short bald assertion that there is some wildlife value in overgrown areas. The land is not dissimilar to many others.</p>						
LPS335	Appendix 11 - Neighbourhood Plan housing requirement methodology		Mr Gez Willard	Willardwillard Ltd	The allocation of 25 housing units within Brown Edge is supported.					Support is noted.	No
LPS30	Neighbourhood Plan Housing Requirement	Table A11.5	Mr Ian Fullilove	Policy Planner Peak District National Park Authority	The Peak District National Park Authority does not recognise housing requirements for settlements. Whilst the rationale for the desirable figure is understood, the National Park Authority 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 parts of the Moorlands. The National Park Authority has attached the Leekfrith Parish Neighbourhood Plan.	Where some parish areas fall within the National Park, it would be helpful to clarify that any housing requirement stated is not a target in the context of planning in the National Park part of Staffordshire Moorlands.	No	No	Yes	Amend supporting text to policy SS4 (paragraph 7.39) to clarify that, subject to the approval of the National Park Authority, the Neighbourhood Area requirements could potentially be met within the National Park.	Yes
LPS246	Appendix 12 - Glossary		Mr Tom Clarke	National Planning Adviser Theatres Trust	The Theatres Trust welcome the definitions of community facilities and cultural facilities provided within the Glossary.		Yes	Yes	Yes	Comments noted.	No