

Response ID	Full Name	Organisation Details	Summary of response	Is an amendment to the SA report required in the light of the response?	Why is an amendment to the SA report required or not?
<b>Question 1</b> <b>Do you support the overall approach taken to the appraisal of options?</b>					
SA56	Ms Christina Sinclair (Historic England)		<p>As a general note (examples include but are not limited to BD076, BD101, BD102, CH001 and CH132) and with regard to SA Objectives 12 and 13, the SA heritage impact is stated as positive. However, on the basis of the SA text and the Landscape, Local Green Space and Heritage Impact Study, the effect is in fact neutral. With regard to SA Objective 13 and LE066/DSL12, the SA heritage impact should be uncertain/neutral rather than positive. A negative/uncertain impact is identified for LE128, LE140 and LE142a&amp;b with regard to SA Objective 13. However, this is not ideal in terms of soundness from a heritage perspective. Historic England would normally advise that sufficient understanding of heritage significance and impact (following informed mitigation) is provided. With regard to SA Objective 13 and LE235, Historic England draws the Council's attention to the conclusion of significant negative for the SA heritage impact. This appears to be in conflict with the Landscape, Local Green Space and Heritage Impact Study conclusion and would benefit from clarification. With regard to SA Objectives 13 and 14 and</p>	Amendment	<p>Site appraisals were carried out between October and December 2015, the appraisal matrices are recorded in section 15 of the SA report. To ensure that the appraisals were both consistent and transparent, a set of definitions of significance were used in undertaking the assessments. The definitions are set out in table 4.5 and show the rationale under-pinning judgements made on the significance of identified effects. In the case of SA objective 13 (heritage), a search area of approximately 400m radius was taken from a site option boundary to identify designated heritage assets that may be directly or indirectly affected by a proposed allocation. At discretion, assets of high importance beyond this distance were included. Where no known heritage assets were identified within the 400m radius a positive effect was recorded. Where one or more heritage assets were identified within the radius, a negative effect was recorded; however the appraisal generally went on to note that since effects are dependent on</p>

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			<p>LE102, this section needs to acknowledge the non-designated heritage asset of Highfield Hall park/garden as noted within the Local Plan and the Landscape, Local Green Space and Heritage Impact Study. The assessment of the impact should be amended where necessary. With regard to SA Objective 13 and BD055, this identifies a significant negative SA heritage impact, which is in conflict with the conclusion within the Landscape, Local Green Space and Heritage Impact Study. With regard to SA Objective 14 and BD055, the conclusion of high beneficial impact here is unclear given the neutral impact conclusion of the Landscape, Local Green Space and Heritage Impact Study. With regard to SA Objectives 13 and 14 and BD071, BD071a, BD108 and BD156, Historic England note the need to bring the SA heritage impacts of these policies in line with the Landscape, Local Green Space and Heritage Impact Study (the Study). The Study's conclusions that they will not cause a high adverse level of harm is in conflict with the conclusions drawn in the SA. With regard to SA Objective 13 and EM2, the Landscape, Local Green Space and Heritage Impact Study identified a negative impact on the</p>		<p>proposal specific information, the exact effects would be uncertain. In some cases the SA recommended that further study should be undertaken to help understand the nature of effects identified. The SA is a living document and several iterations have been prepared and consulted on alongside the emerging Local Plan, the symbols used in the matrices have not been amended as the Council continues to build its evidence base (although any inaccuracies in the text of the matrices have been corrected). In place of amending the symbols, a written commentary has been used to clarify and add detail to the findings of the initial appraisals as the Council builds its understanding of the sustainability effects of site allocations. For each site option, Section 6 of the SA report provides a summary of the 2015 appraisal, updated with findings from any additional evidence commissioned by the Council intended to help the Council understand the nature of effects identified. In the case of heritage impacts, for each relevant site option, Section 6 of the SA report provides a summary of the findings of</p>

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			highly designated (II* listed) historic site yet the level of harm is identified as uncertain in the SA. Historic England advises Staffordshire Moorlands to review the above and make the necessary amendments.		the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016 and subsequent updates). This means that the 2015 appraisal matrices, and the symbols used to represent the nature of predicted effects, should be read in conjunction with the additional detail provided in the full accounts of each site assessment recorded in section 6 of the report. <b>Changes to SA report in the light of the comments made by Historic England:</b> The site summary section for LE102 in the SA report (February 2018) should be updated to include findings from the Council's evidence base report: Landscape, Local Green Space and Heritage Impact Study: Assessment of additional sites; October 2017.
SA58	Seabridge Developments Limited		Assessment of environmental impacts of BDNEW have been understated and the assessment of impacts of BD062 have been overstated, contrary to the available evidence. With regard to Paragraphs 6.477-6.480 and Table 15.316, Seabridge Developments consider the impacts on the environmental objectives (12-14) to have been greatly understated, particularly in relation to the intrusion on the Biddulph Valley Way,	Amendment	BDNEW: The appraisal of land at BD116 (assessment table at page 1775) records a negative effect for SA objective 1 noting that development of the site could reduce the quality of Green Infrastructure. It also records a negative effect for objective 10 noting that ecological assessment is required; a negative effect for objective 11 noting that the land may have formerly been

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			<p>sprawl into open countryside and the impacts on ecology and the water course. Objective 13 should be at least a minor negative effect (-), not a minor positive (+). The assessment of Site BDNEW is inadequate and does not properly reflect the known constraints. Seabridge Developments therefore maintain that the Plan should be modified to reflect this, and that exceptional circumstances justify the allocation of BD062 which was heavily hinted by the Inspector who examined the Core Strategy. Appraisal of site BD062 (paragraphs 6.383 - 6.399) is incorrect, numerous positive effects have been undervalued or ignored and the ecological impact has been greatly overstated.</p>		<p>used for open cast mining; and a negative effect for objective 14 noting that effects on landscape character would be likely. Based on the site's location within flood zone 1, a positive effect was recorded for objective 9 whilst noting that there may be limited areas of surface water flooding on site currently. The site summary provided at paragraphs 6.477 - 6.480 notes that landscape and heritage assessments are required. These have now been undertaken. The site summary section for BDNEW should be updated to include findings from the Council's evidence base report: Landscape, Local Green Space and Heritage Impact Study: Assessment of additional sites; October 2017. The findings of the appraisal of BD062 are recorded in a matrix from page 569. To ensure that appraisals of site options were both consistent and transparent, a set of definitions of significance were used in undertaking the assessments. The definitions are set out in table 4.5 of the SA report and show the rationale underpinning judgements made on the significance of identified effects.</p>

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SA54	David Dale		Derbyshire County Council (DCC) has no comments to make on the SA.	No amendment required	No comment is noted.
SA62	Mr Grant Anderson		<p>Fradley Estates have attached extracts from the SA, their representation submitted at previous consultation stages regarding the development of Land off Tregaron Court and Langton Court, and a Landscape Evidence Report and associated appendices. Fradley Estates object to the SA, which contains a number of errors and omissions which invalidate the conclusions of the SA. The SA contains omissions in relation to the appraisal at section 15.4.3, with regard to sites WE003 and WE052. The appraisal of the site off Langton Court/Tregaron Court also contains omissions and errors (15.8.3). The SA contains the following errors in relation to sites WE003 and WE052:</p> <p>With regard to criterion 2, no account is taken of the fact that WE003 and WE052 lie to the south of Ash Bank Road, and that residents of both sites would need to cross that road to access community facilities. Ash Bank Road is a very busy road with a history of accidents, yet there are no pedestrian crossing facilities within the vicinity of the two sites. This information should be factored into the assessment. With regard to</p>	No amendment required	<p>To ensure that the appraisal of all development site options were both consistent and transparent, a set of definitions of significance were used in undertaking the assessments. These definitions are set out in table 4.5 of the SA report and record the rationale underpinning judgements made on the significance of identified effects. Findings of the assessments undertaken of site options WE003, WE052, WE042 / WE043 (recorded in sections 15.4.3 and 15.8.3) are in line with these published definitions of significance. For each site option, Section 6 of the SA report provides a summary of the appraisal, updated with findings from any additional evidence commissioned by the Council and intended to help the Council understand the nature of effects identified. A Green Belt review study was undertaken by Amec Foster Wheeler in November 2015. Part 1 of the study reviewed the contribution of land to Green Belt purposes as set out in the NPPF</p>

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			<p>criterion 3, no account has been taken of the location of WE003 and WE052 adjacent to the HM Young Offenders Institution, and their proximity to the busy Ash Bank Road. The location of the sites next to the HMYOI will result in conflict between incompatible land uses and will create a poor residential environment for residents, particularly with regard to noise. The location of the sites to the south of Ash Bank Road will also have a negative impact on this criterion. With regard to criterion 4, the location of WE003 and WE052 next to the HMYOI will increase the fear of crime for residents. The sites will therefore have a negative impact, not a positive impact in terms of this criterion. With regard to criterion 5, the location of WE003 and WE052 next to the HMYOI will limit the quality of development that can be achieved. For example, Site WE052 backs onto the high concrete and barb wire perimeter fencing to the HMYOI. With regard to criterion 6, no account has been taken of the location of WE003 and WE052 to the south of Ash Bank Road, with the community facilities being situated to the north. This raises highway safety concerns. With regard to criterion 14, the SA does not take account of the fact that the</p>		<p>and part 2 considered specific sites proposed for development or land with potential for release. NPPF defined Green Belt purposes, against which options were assessed, include: To preserve the setting and special character of historic towns/ villages. Criteria used for this assessment are set out in the Green Belt report. The Council's Green Belt review (2015) considered site option WE003 to make a significant contribution to the Green Belt purpose of preserving the setting of historic towns / villages. The study concluded that site WE003 could be considered for release from the Green Belt if exceptional circumstances can be demonstrated and subject to the northern part of the site being retained as open space to preserve its openness. The capacity of the site was lowered from 85 to 50 dwellings to take this into account. This conclusion is reflected in the SA report at paragraph 6.1045. The Council's Green Belt review (Additional Site Appraisals, September 2016) considered site option Land off Tregaron Court, Werrington to make a contribution to the purpose of preserving the setting the</p>

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			<p>ecological appraisal for the site concluded that development would not impact Wetley Moor. With regard to criteria 15/16, Sites WE003 and WE052 will both create lower quality residential development than Sites WE042 and WE043. As such, both sites should be scored lower than WE042 and WE043. Furthermore, Sites WE042 and WE043 (FE's Site) have not been compared on a fair and consistent basis in comparison to the assessment of Site WE003. FE's Site has been assessed in the Green Belt study as making a contribution to the setting of Werrington, whereas Site WE003 has been assessed as making a significant contribution to the setting. Yet no account has been taken of this contribution Site WE003 makes in the SA. With regard to the above paragraph, FE's Site is ranked negatively by virtue of its location within an important setting to the settlement of Werrington as identified in the Council's Landscape and Settlement Character Assessment 2008. However, that evidence has now been superseded by later evidence, specifically that from the Green Belt Assessment 2016 and the Landscape and Green Belt Assessment by Bright and Associates. The Green Belt Assessment 2016</p>		<p>setting of historic towns / villages. The study's overall recommendation for Green Belt boundary revision was that Land off Tregaron Court has potential for release under Exceptional Circumstances reflecting the well-bounded character of the site and opportunity to create a more sympathetic settlement edge in this location. Careful master-planning would be needed to ensure proper edge treatment. This conclusion is reflected in the SA report at paragraph 6.1099. The sustainability appraisal of site options included consideration of the likely nature of effects of site allocation against SA objective 14: to protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources. The guide to determining the significance of effects against this objective is published in table 4.5 of the SA report. Wardell Armstrong Landscape and Settlement Character Assessment of Staffordshire Moorlands (2008) provides the current evidence base for the Council in relation to determining those areas of landscape setting to</p>

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			<p>concludes that FE's Site does not make a significant contribution to the setting of Werrington, and that it has a well-bounded character which provides an opportunity to create a more sympathetic settlement edge in this location. The Bright and Associates Landscape and Green Belt Assessment applies a Medium-Low landscape sensitivity to FE's Site. According to their assessment, the site does not have a high visual prominence given the existing boundary vegetation which provides effective screening. Yet the area to the north of Werrington falls within the Green Belt and forms an important landscape setting. As such, FE's Site is not seen as encroachment as it is separate to the wider area of the Green Belt. It does not represent a significant intrusion into open countryside and does not comprise the openness of the countryside. Bright and Associates conclude that the allocation of FE's Site would improve the existing settlement edge on the northern edge of Werrington, and would be defined by open space and Causley Brook. This would create a more coherent boundary and a transitional edge between open countryside and existing residential development. In conclusion,</p>		<p>settlements considered to be of importance with regards to their ability to accommodate development without compromising landscape character. For site WE003 the commentary in the appraisal matrix in section 15.4.3 relating to the likely nature of effects of site allocation notes that it is considered that there would be limited effects on landscape character. Proposal specific information is required to assess the impact on the Potteries and Churnet Valley National Character Area. Overall this site has been assessed as having a negative effect on SA Objective 14. In addition, the site summary in section 6 notes that WE003 was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of medium landscape sensitivity; site-specific landscape mitigation measures were proposed (SA report para 6.1049). For WE042 / WE043 the commentary in the appraisal matrix in section 15.8.3 relating to the likely nature of effects of site allocation notes that the site is within the area considered to be important landscape setting to the settlement. Proposal</p>



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			Site WE052 should not be classed as forming part of an important landscape and should be re-scored in the SA. Site WE003 which has been identified in the 2016 Green Belt Assessment as making a significant contribution to the setting of Werrington, should be re-scored to reflect this.		specific information is required to assess the impact on the Potteries and Churnet Valley National Character Area. Overall, this site has been assessed as having a significant negative effect on SA Objective 14. The Council is commissioning additional evidence in relation to WE042 / WE043 with respect to landscape sensitivity and to identify any potential site-specific landscape mitigation measures as appropriate. Map 22.14 in the SA report presents Werrington and Cellarhead (with potential development site options as identified in 2015) and planning constraints. The map shows the extent of the area identified as "important landscape setting to settlement" based on the Council's current evidence (Wardell Armstrong Landscape and Settlement Character Assessment of Staffordshire Moorlands; 2008). If this evidence should be updated, the map will be amended accordingly.
SA37	mr stephen thwaite		Objects to Nathaniel Lichfield & Partners (NLP) producing the entire SHMA. Furthermore, the use of information on regional growth figures by Oxford Economics job growth figures cannot be used as a basis for underpinning the SHMA as all	No amendment required	NLP is considered to be appropriately qualified for the preparation of this part of the Council's evidence base. The consultancy has recognised expertise in housing needs assessments and has provided technical

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			their forecasts are regional, not local. Lastly, the appraisal of the options are OK but based on optimistic reports and expectations.		evidence for a wide range of clients including developers, housebuilders and local authorities. NLP has given evidence at numerous Examinations and Inquiries. The lead consultant on the SHMA prepared for SMDC leads Lichfield's economics team in Manchester.
SA53	Mrs C Burton		Objects to testing the Local Plan objectives against the SA Framework re EN128. Also to summary of significant plan effects and mitigation measures table 8.1 re Policy T1 (Development and sustainable transport) With regard to SA Objective 1, the development of Site EN128 will in no way improve the quality of where people live and work. With regard to the following sentence, Significant positive effects on a wide range of SA objectives were identified, including for health and well-being; creating and maintaining high quality local neighbourhoods; reducing the need to travel by car and increasing access to a range of services and facilities, the proposed development at Site EN128 will not achieve this. The residents are already under stress from the parking that happens in the avenue twice a day. The pedestrians (including children) who use the footpaths are constantly on	No amendment required	The SA objectives were agreed at the SA Scoping stage (2014). The Local Plan objectives have been carried forward from the adopted Core Strategy with minor amendment. In table 11.1 the SA records how the objectives of the Local Plan are in accordance with sustainability principles. Appraisal of preferred option policies identified that Policy T1 Development and Sustainable Transport supports development which reduces reliance on the private car for journeys, reduces the need to travel generally and helps to deliver more sustainable settlement patterns.

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			guard and concerned because it is unsafe. Additionally, local services (e.g. schools and doctors) are nearly at full capacity. It is currently difficult to get a doctor's appointment within three weeks. The Council should consider building bigger schools in a place where parking is on site away from congestion. Other sites in Endon are more suited to development.		
SA55	Mrs Maureen Cotton		Respondent expresses concerns regarding the development of Site EN128 (Table 15.169 of the SA). With regard to SA Objective 9, 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. With regard to SA Objective 10, 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	No amendment required	The EN128 site summary from page 168 of the SA report notes the presence of a watercourse along the site's southern boundary and suggests that flood risk assessment / modelling and early engagement with the County Council and Environment Agency should be required. The Council's Extended Phase 1 Habitat Survey (2015) considered that the site has fairly low biodiversity value overall.

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			avenues in the area, the schools, and the oversubscribed A53. Development of Site EN128 will turn the village into urban sprawl. Furthermore, the respondent finds the assessment against SA Objective 10 misleading because 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.		
SA1	Mr Robert Moseley		Respondent supports the overall approach taken to the appraisal of options because it allows for residents to have a say. However, the respondent feels that it would have been better had local residents been asked at the start where they thought the development should go rather than being given a set of options.	No amendment required	Support given for overall approach taken to appraisal of options (although caveat noted that respondent would have preferred to have been asked at the start where they thought development should go, in place of commenting on options provided).
SA23	Mrs Cynthia Toft		Respondent challenges SA Objective 1 (Paragraph 11.2) with regard to Site EN128. They feel that development of Site EN128 will not improve the quality of where they live but will bring extra traffic and car fumes to Brookfield Avenue, which already experiences traffic problems at school drop-off and pick-up times. There is queuing at	No amendment required	The SA objectives were agreed at the SA Scoping stage (2014). The Highway Authority's view is that Brookfield Avenue is an existing residential road with parking restrictions to restrict parking at school opening/closing. There will be additional traffic using Brookfield Avenue, but this is

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			the top of the avenue where there is a roundabout (and where the access to the site is proposed). Parking takes place on the pavements along the length of the avenue, which are all in a state of disrepair. Adding to this traffic problem is an accident waiting to happen, especially with school children from Endon High and St Luke's Junior School walking up and down the avenue. Respondent suggests that the Inspector should come and see the chaos along Brookfield Avenue in person. An extra 22 homes plus more cars is imperceivable.		considered by the Highways Authority to be acceptable and appropriate.
SA68	Mr Robert Simcock		Sites BD068 and BD087 were proposed for the development of up to 100 dwellings. However, these two sites have been replaced by Site BDNEW. Respondent references the SEA Directive, stating that with regard to the aforementioned case, there is no indication in the SA of the specific comments received in relation to Sites BD068 or BD087, and how they have been addressed. Yet this is a requirement of the SEA regime. There is also no mention of the additional social and economic benefits that would accrue from the development in the Council's evidence base (particularly the SA), yet the community benefits would be significant.	No amendment required	The Council has prepared the SA in accordance with relevant legal obligations and planning guidance. The SA report sets out the reasons that rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.

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			<p>These benefits include accommodation for the elderly, which will have the knock-on benefit of freeing up under-occupied family housing and making the most efficient use of housing stock, the provision of a creche, funding towards a doctor's surgery and a police post. Notably all consultation responses to date have been positive regarding the proposed development. The SA is obliged to give adequate reasons for selecting particular options as reasonable alternatives, and rejecting others. Yet this SA has not done so. The release of the sites and their allocation for residential development is a reasonable alternative. In summary, the SA should be redone, following proposer procedure and based on adequate evidence. Â The SA should provide reasons for preferred particular options throughout, and the Council's consideration of the sites must be amended to correctly take into account the evidence before the Council.</p>		
SA60	Mr Mark Bullock	Knights LLP	<p>The OAN range of 235 to 330 has been taken forward into the Submission version Local Plan, however Policy SS3 only provides an annual requirement of 320 dwellings per annum, a reduction of 10 dwellings per annum. The SA fails</p>	No amendment required	<p>The Staffordshire Moorlands SHMA Update 2017 (Nathaniel Lichfield &amp; Partners; February 2017) considered that the appropriate range for the district's objectively assessed housing need was</p>

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			to address the potential implications of reducing the housing requirement on the longer term sustainability of the District.		between 235 dpa and 330 dpa. On this basis, the SA appraised four potential housing requirement alternatives in February 2017 as follows: Option 1: 235 new homes each year (2014 - 2031) Option 2: 260 new homes each year (2014 - 2031) Option 3: 330 new homes each year (2014 - 2031) Option 4: 450 new homes each year (2014 - 2031) At the Council Assembly meeting on 8th March 2017 it was resolved to take forward into the Preferred Options Local Plan an annual housing requirement of 320 homes per year. The report to Council Assembly set out a number of reasons for this being the recommended preferred option. A sustainability appraisal of the preferred option (320 homes per year) was undertaken in December 2017. This appraisal considered the sustainability effects of the preferred option in greater detail to analyse any likely adverse effects and, where appropriate, to identify mitigation measures that may be required to prevent, reduce or offset these effects.
SA61	Renew Land Development Ltd.	Knights LLP	The OAN range of 235 to 330 has been taken forward into the Submission version Local Plan, however Policy SS3 only provides an annual	No amendment required	Please see response to SA60.

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			requirement of 320 dwellings per annum, a reduction of 10 dwellings per annum. The SA fails to address the potential implications of reducing the housing requirement in the longer term sustainability of the District.		
SA41	MRS Rebecca Lea		The outlined Green Belt area of N17 (C) includes recreational facilities. On other plans, only the southern section of BD117 (Policy DSB 3) is designated as preferred mixed use allocation. The respondent requests clarity on whether the northern section will remain open space as it is unclear on the photograph.	No amendment required	The Council's Green Belt review undertaken by consultants Amec Foster Wheeler in November 2015 includes at Appendix B a photograph of Parcel N17: Land to the south of Biddulph. This is a parcel of land contained by the current urban edge of Biddulph and Mill Hayes Road. Site BD117 (Tunstall Road Strategic Development Area) is not the same as N17 but is located within Parcel N17. BD117 contains no recreational facilities.
SA70	Mr Andy Brown	Knights 1759	The SA does not provide evidence to robustly justify the release of the allocation proposed under Policy DSR1 for housing in preference to employment. Furthermore, the release of this site for housing was not fully considered against all other reasonable alternatives. The NPPF requires a Sustainability Appraisal to be in integral part of the plan preparation process, and to consider all the likely effects on the environment, economic and social factors	No amendment required	The Blythe Vale Strategic site was appraised for potential mixed use development and the findings of the appraisal published in the July 2017 and February 2018 SA reports. This site is considered to represent a unique opportunity to help meet the District's objectively assessed housing need in line with the principles of the spatial strategy and to reduce the amount of land that will be required to be removed from Green Belt. The



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			(Paragraph 165).		<p>Council is not aware of any alternative, available sites that are of this scale or status. Core Strategy Policy SS8 supports the development of a Regional Investment Site for high quality, regional scale employment development at Blythe Vale. Given that this site is intended to serve a regional need, it is considered independently of the employment land requirement for the District. The Duty to Cooperate statement published with the Submission version Local Plan February 2018 notes that an outcome of discussions with Stoke on Trent City Council and Stafford Borough included agreement for liaison to implement Policy DSR1 (Blythe Vale) - mixed-use development of employment, 300 homes to the north of the site and supporting infrastructure measures. As part of ongoing plan preparation the Council identified and appraised a number of alternative options for delivering growth in rural areas. An SA of these alternative options was carried out in December 2017 in order to ensure that the Local Plan published for representations in February 2018 was based on a development approach for the</p>

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					rural areas found to be the most sustainable when considered against reasonable alternatives. An account of this is provided in section 6.5 of the SA report February 2018. The preferred option set out in the SA Report February 2018 was Option 5 (the preferred approach July 2017) - Growth redirected to towns accompanied by strategic site release. This option proposes to: Reduce the Rural Areas share of the District's housing requirement from 28% to 25% in order to reflect the constrained supply of suitable sites. Increase Cheadle's share of the District's housing requirement from 22% to 25% to reflect the availability of suitable development sites outside of the Green Belt. Identify a strategic site to consolidate growth in the rural areas. Identify further sites in larger villages, and a windfall allowance, restricting Green Belt release.
SA69	Mr Andy Brown	Knights 1759	The SA fails to address the potential ramifications of reducing the housing requirement on the longer term sustainability of rural areas, namely: Whether affordable housing would be delivered in larger villages. The potential reduction of economically active households and younger	No amendment required	The Staffordshire Moorlands SHMA Update 2017 (Nathaniel Lichfield & Partners; February 2017) considered that the appropriate range for the district's objectively assessed housing need was between 235 dpa and 330 dpa. On this basis,

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			households and the knock-on effects in terms of support for local services. Travel to work patterns - some larger villages may have lower average travel to work patterns than some other settlements. The need to address previous/constrained under-delivery of housing in rural settlements and the long term impact that this has on affordability and age profile of a rural settlement. The need for/demand for smaller house types in rural areas. The need for/demand for family housing.		the SA appraised four potential housing requirement alternatives in February 2017 as follows: Option 1: 235 new homes each year (2014 - 2031) Option 2: 260 new homes each year (2014 - 2031) Option 3: 330 new homes each year (2014 - 2031) Option 4: 450 new homes each year (2014 - 2031) At the Council Assembly meeting on 8th March 2017 it was resolved to take forward into the Preferred Options Local Plan an annual housing requirement of 320 homes per year. The report to Council Assembly set out a number of reasons for this being the recommended preferred option. A sustainability appraisal of the preferred option (320 homes per year) was undertaken in December 2017. This appraisal considered the sustainability effects of the preferred option in greater detail to analyse any likely adverse effects and, where appropriate, to identify mitigation measures that may be required to prevent, reduce or offset these effects. A summary of the predicted sustainability effects of the preferred option is set out from paragraph 6.18 of the February 2018 report. This summary highlights the SA

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					findings that delivery of 320 new dwellings per year is expected fully to meet demographically driven housing needs and will help to address affordable housing need. Delivery of 320dpa is expected to have a direct, long-term positive effect on provision of homes to meet local needs, including the needs of an ageing population. Overall the preferred option is considered to provide a balanced range of positive social, economic and environmental effects. As part of the appraisal a number of mitigation measures were identified. These included a recommendation that Local Plan policies should ensure support for sustainable economic growth, including support for tourism and the visitor economy and town and village centres. For the rural areas this is achieved including via Policies SS8 Larger Villages Areas Strategy and Policy SS9 Smaller Villages Area Strategy.
SA57	Mr Paul Hill		The SA is supported and provides a comprehensive approach to site selection including consideration of reasonable alternatives and a clear basis for the selection of the preferred options, consistent with the SA/SEA	No amendment required	Overall support for the SA noted. Table 6.10 on page 231 provides an account of the development approach options dismissed following appraisal. For option 2, the text notes that the cumulative impacts of

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			<p>Regulations. However, RPS believe the SA has overestimated the negative effects associated with Option 2 (South western focus) and Option 4 (North-south clusters with small sites scattered through the town) on pages 231 (Table 6.10) and 234 (Table 6.12) respectively. Firstly, there is no substantive evidence that the proposals will lead to a disturbance of protected species. Secondly, the proposals would not increase the risk of flooding, by keeping development clear of Flood Zones 2 and 3 and the provision of on-site attenuation, which would decrease the risk of downstream flooding. Similarly, the assessment of DSC3 (page 282) is considered to represent a significant negative effect.</p>		<p>development could result in both disturbance of habitats (and their connectedness) and of protected species; and an increase in the risk of flooding. This assessment reflects SA report paragraph 6.1345 and paragraph 6.1346 that note that option 2 includes sites CH002A and CH024 which border Cecilly Brook Local Nature Reserve, one of the most important sites for water voles (a protected species) in Staffordshire. In addition, sites CH002B, CH006 and CH009 are within 100m of the Reserve. Also option 2 includes sites CH002A, CH006, CH020 and CH085B all of which are partly located within a flood zone 3 area; and sites CH085A and CH093 that are partly within flood zone 2. Table 6.12 on page 234 of the report provides an account of the development approach option recommended to be taken forward following appraisal. The text for option 4 (the recommended preferred option) notes that the cumulative impacts of development could result in an increase in the risk of flooding (the effects are less significant than under all other options identified); and</p>

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					<p>disturbance of habitats (and their connectedness) and of protected species that could not be reasonably mitigated (the effects are less significant than all other options identified) however it is recommended that strategic development site policies require master-planning growth that may impact on the Cecilly Brook Local Nature Reserve in order to manage impact on the LNR and enable achievement of Water Framework Directive objectives. Table 8.1 on page 282 provides a summary of the Plan's significant effects as well as mitigation measures where appropriate. For Local Plan Policy DSC3 Mobberley Strategic Development Area (sites CH085a, b, c and d; CH128) the table records that the area's landscape sensitivity and potential ecological value could have a significant negative effect. This reflects the Council's evidence base that identifies sites CH085a, b and c as having medium landscape sensitivity and the findings of the 2015 Ecology Study that notes site habitats are mainly species poor and moderately connected to other more biodiverse habitats with some species rich</p>

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					hedgerows and mature trees present. The table also identifies associated mitigation measures, stating that the Policy requires development to be subject to comprehensive master-planning to include mitigation measures identified in the Council's Landscape Local Green Space and Heritage Impact Study.
SA39	mr stephen thwaite		The sensitivity tests used by Nathaniel Lichfield & Partners are not locally accurate enough and forecast growth figures are over-optimistic. More information is needed on the Brexit effect.	No amendment required	The two forecasting houses referenced in the SHMA Update 2017 prepared by NLP, namely Experian and Oxford Economics, are both considered to produce credible and robust estimates of job growth at a local area level. The 2017 SHMA update also reviews post-Brexit economic job growth forecasts.
SA65	V Morrell		With regard to Paragraph 11.2 (SA Objective 1), the development of Site EN128 would not improve the quality of the area. It would result in an influx of traffic, which would increase exhaust fumes.	No amendment required	Please see response to SA63
SA19	Mrs Jane Bagguley		With regard to Table 5.1, respondent does not agree that the SA Objectives are sound and feels that they are, in relation to Site EN128, incompatible. With regard to Table 15.169, respondent makes the following points: With regard to SA Objective 1, development of EN128	No amendment required	The SA objectives were agreed at the SA Scoping stage (2014). The Local Plan objectives have been carried forward from the adopted Core Strategy with minor amendment. In table 11.1 the SA records how the objectives of the Local Plan are in

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			<p>would not improve the quality of where people work and live because the site is between two schools, which can cause chaos during term-time. With regard to SA Objective 3, development of EN128 would have a great impact on the health and safety of all who live near and travel to the site. With regard to SA Objective 6, according to a survey conducted in September 2017, the number of journeys made into and out of Brookfield Avenue on a typical school day is in excess of 250. With regard to SA Objective 8, more houses and at least two cars per household will not improve air quality. With regard to SA Objective 9, the area already experiences problems with flooding. This is because Site EN128 and Brookfield Avenue are located at the bottom of a very steep hill. As such, heavy rainfall brings surface runoff which carries debris from the unmetalled tracks. This blocks the drains laid down in the 1930s. With regard to SA Objective 13, Site EN128 is the only green space left in an already built-up area, so its development will not enhance the village. With regard to Paragraph 2.6, respondent makes the following points about Site EN128: With regard to Spatial Objective 2 from the Local Plan, a stream runs through Site</p>		accordance with sustainability principles.



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			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 from the Local Plan, 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. With regard to Spatial Objective 10 from the Local Plan, 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.		
SA63	K Morrell		With regard to testing Local Plan objectives against the SA Framework, paragraph 11.2 (SA Objective 1), the development of Site EN128 would not improve the quality of the area. It would result in an influx of traffic, which would increase exhaust fumes.	No amendment required	The SA objectives were agreed at the SA Scoping stage (2014). The Local Plan objectives have been carried forward from the adopted Core Strategy with minor amendment. In table 11.1 the SA records how the objectives of the Local Plan are in

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					accordance with sustainability principles.
SA67	Dr Anil Vaghmaria		<p>With regard to the development at Site EN128, SA Objectives 1 and 3 will not be met. 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. Respondent also references SA Objectives 2, 8, 9, 10 and 14. 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. Staffordshire Moorlands has an ageing population whereby 21% of the population is over 65 years of age. Maybe a much smaller number of bungalows (6-10) could be accommodated at this site, and overcome many of the concerns expressed by local residents. It would also have a lesser impact on the environment and health, with less cars and residents.</p>	No amendment required	Please see response to SA63.
SA24	Mr Robert		Yes.	No	Support for overall approach taken to

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	Moseley			amendment required	appraisal of options is noted.
<b>Question 2</b>					
<b>Have we correctly identified the main significant effects and potential mitigation measures?</b>					
SA2	Mr Robert Moseley		Addressing school places, transport and environmental impacts (e.g. pollution) are important. Some examples of where utilities need to be improved to cope with increased housing are waste management and the recent overflow of sewage.	No amendment required	Comment noted in relation to need to address school places, transport and environmental impacts (e.g. pollution) of new development.
SA12	Mr Paul Holdcroft		In respect to Bagnall Parish, the assessments as to how and how far sites BG008, BG014 and BG015 meet the Council's SA Objectives do not in all cases, and in the ultimate conclusion, present a true and fair picture of their actual suitability or otherwise for further development. The Sustainability Report should be amended accordingly. With regard to sites BG008, BG014 and BG015, the following comments apply: With regard to the section Summary of overall assessment and likely significant effects, realistic, true assessments of the site indicate that the creation of a modern mini-estate in Bagnall would bring change for the worse, with adverse effects on the historic nature of the village and landscape. There would be no significant	No amendment required	To help ensure that all SA site assessments were undertaken in a consistent and transparent manner "definitions of significance" were used to guide the determining of significance that is recorded in the appraisal matrix. The overall assessments for BG008, BG014 and BG015 made against each of the SA objectives are consistent with these definitions of significance. The definitions are published in a table on page 31 of the February 2018 SA report. The symbol representing the overall assessment should be read alongside the commentary on the likely nature of the effects of site allocation recorded against each SA objective and the summary of

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			<p>countervailing benefit, failing to meet the Council's Strategic Objectives. Appropriate, limited infill and a modest roadside extension of the village settlement area would, however, better meet aspirations for more housing. With regard to SA Social Objective 2 (BG008), the assessment states that there are no schools in Bagnall. There are also no shops, doctors or chemists. There are three weekday buses per day from Bagnall to Hanley (09.20, 12.55 and 15.55) and two back (12.15 and 14.50) which would not support normal working hours. There are none on Sundays or Bank Holidays. Even if this site (BG008) and sites BG014 and BG015 were fully developed, the additional population would not make the business case for the provision of further transport services or any commercial or health facilities. Again with regard to SA Social Objective 2, BG008 has been assessed as having a significant negative effect yet the assigned rating is a single negative sign (-) rather than a double negative sign (--). With regard to SA Social Objective 3, there are no health facilities in Bagnall, three buses a day to where there is a GP Surgery (and only two back) and no convenient bus to a hospital. The only practical method of</p>		<p>findings for the sites included from page 193 of the February 2018 SA Report.</p>

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			<p>transport to such facilities is by car, motorcycle, taxi or ambulance. Additional population will inevitably add to the use of cars. As such, the assignment of a positive effect to health and the reduction of health inequalities as a result of the development of BG008 is incorrect; it should at best be neutral. With regard to SA Social Objective 4, there is no logic to the contention that a few more properties would lead to less crime. For the reasons given above, it is likely that the site would contain expensive properties, which would pose a greater target for crime. The assessment should not be positive; it should at best be neutral. The financial viability of developing the country site, given the difficult and thus expensive provision of access and services (particularly sewerage) will depend on the likely return. Rural land granted planning permission and large enough for a mini-estate in an historic village will command a premium price. For a developer to cover high input costs they will have to sell expensive rather than affordable/social /extra care houses. It is a relatively small site and thus there would be little if any scope for loss-producing, affordable housing. The assessment that development of</p>		

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			<p>this site would have a significant positive effect on this SA Social Objective 5 is incorrect. With regard to SA Social Objective 6, a small increase in the population will not increase the viability of a bus service because it is highly unlikely that those able to afford a property on a new mini-estate on the edge of an historic rural village would not have a car. The assessment that the development would result in an increase in the use of public transport and a positive effect on the attainment of the Objective, is therefore not justified. Development would, instead, increase the number of journeys by car. As such, the assessment should be a negative one. With regard to SA Environmental Objective 7 (and as set out in relation to SA Social Objective 6 above), the most probable result of building more properties will be an increased use of cars and thus a negative effect on contribution to climate change. The positive assessment of development should thus be changed to negative. With regard to SA Environmental Objective 8 (and as stated above), additional development will lead to increased use of cars and thus have a negative effect on air quality. The assessment should therefore be negative. With regard to SA</p>		

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			<p>Environmental Objective 9, the conclusion of a positive assessment is not justified by the commentary; it is the negative side of indeterminate and should at best be neutral. With regard to SA Environmental Objective 10, the assertion that the site is fairly poorly connected to other biodiverse habitats is not correct. There is a nearby pond with newts, frogs and voles, which is visited by herons. The hedgerows, ditches and bordering trees are home to bats, birds, foxes and badgers. With regard to SA Environmental Objectives 13, 14 and 15: How can building over such green belt natural environment offer opportunities to enhance the natural environment? The building of a modern mini-estate on the skyline edge of an historic village could not fail to change its character and adversely alter the appearance of the landscape from near or far. The positive assessments are misplaced and should be changed to negative ones. With regard to SA Economic Objective 16, the development of the site is likely to have little effect on economic viability but such as it may, will be to safeguard the viability of businesses in Stoke-on-Trent rather than the Staffordshire Moorlands economy. With regard to SA Economic</p>		

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			Objective 18, there are very limited business opportunities in Bagnall, such that a few more residents will not affect them. There is no shop and the pub/restaurant draws most clientele from surrounding towns and suburbs. Bagnall Heights retirement village is still not included within the village boundary, but again, its level of employment is unlikely to be affected by the development of the site. The critical population to support or encourage a shop, industry or further significant employment in or near to Bagnall is well above its present or any proposed levels. The significant positive assessment is not justified.		
SA40	mr stephen thwaite		School leavers are forced to move on to higher education and job opportunities outside Staffordshire Moorlands due to low wages and lack of affordable homes in the district. The Council should incentivise technology companies to locate in Leek. Housing delivery damages the character of the town, only affordable homes are needed in Leek.	No amendment required	The Local Plan sets out a vision for Leek that includes enabling major employers in the town to grow, balanced by new businesses on improved existing and new employment sites. The vision also includes new housing to support the role of the town. Local Plan Policy H3 identifies measures to address the need for affordable housing.
SA59	Seabridge Developments Limited		The SA findings for Site BD062 are inaccurate and inconsistent in terms of the Council's own Preferred Options Site Assessment, and also in comparison with the significance of the issues	Amendment	Please see response to SA58. Additional text to be added following paragraph 6.480: <u>The site was considered by the Council's Landscape, Local Green Space and Heritage</u>



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			<p>affecting the land to the west of Biddulph Valley Way (BDNEW). The land north of York Close (BD062) is capable of delivering around 35 dwellings with an appropriate mix and layout that has regard for all known constraints of which there are relatively few, including: the triangular shape of the site, existing sewer easements, the informal/non-statutory path that links from the southern boundary to the footpath and housing to the west, strong boundary tree cover to the east and the proximity of the sewage works to the north-east. The developable area contains no trees of any significance, but the more important boundary vegetation could be retained. The site is of low visual prominence and there would be no landscape or heritage impacts, the site is in Flood Zone 1, vehicular and pedestrian access is readily available, odour and noise impact assessments have demonstrated that the sewage works is no an impediment to the suggested development of 35 dwellings and ecological assessments undertaken and updated over three consecutive years confirm that the site holds little ecological value. Any suggestion by objectors that the site would cause significant harm to protected species is unsubstantiated by the</p>		<p>Impact Study (Assessment of additional sites; October 2017) which notes that there are six <u>Grade II Listed Buildings within the 400m buffer. The Grade II Listed Mow Cop Castle was visible from the site, located approximately 1.8km west. Due to the intervening buildings and vegetation, development would not adversely impact upon the settings of the assets. From Mow Cop Castle, development in the site would be viewed against a backdrop of existing development and would not impact upon its setting. The HER records the site of a colliery within the site boundary, which may be physically impacted upon by development (PRN 51705). The northern part of the site is set within the HLC zone BBHECZ 2 (Historic Environment Character Assessment 2010). The particular HLC type is least susceptible and development would not alter the character of the zone significantly. The southern part of the site is within the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). Development in the site would change an element of the HLC zone BBHECZ 3 (Historic Environment</u></p>

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			<p>objective evidence. The assessment table at 15.2.3 of the SA is incorrect in the following respects: SA Objective 1: development would allow for the formalisation of an unofficial/informal desire line across the site to maintain pedestrian access/permeability to the benefit of community cohesion. The score should therefore be + or at least 0 as opposed to -. SA Objective 10: in the light of the three ecological assessments previously submitted to the Council, there is nothing to suggest that the development of this site would cause significant harm to important ecological interests. Indeed, the incorporation of appropriate planting, together with bat and/or bird boxes would provide an opportunity to enhance biodiversity. The score should be entered as + as opposed to -/?. SA Objective 11: The site is not in agricultural use, nor has it been in the past. It would not represent a viable parcel and in any event, it is classified as Grade 4 (not best and most versatile). The score should be entered as ++ not -. SA Objective 13: The site is currently unkempt scrub land. As such, its development would enhance the character and appearance of the area, provide for appropriate pedestrian connectivity, open space</p>		<p>Character Assessment 2010). However, with sensitive design, this could be mitigated. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (Assessment of additional sites; October 2017) to be of high landscape sensitivity. The site is located beyond the dismantled railway, which currently forms a strong, vegetated settlement edge and limit to development. The site is inter-visible with the Green Belt to the west. Development within the site would encroach on the surrounding countryside, and would adversely affect the existing settlement edge. Development of the site could potentially compromise the surrounding sensitive countryside, as there would be no clear limit to development beyond the site.</p>

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			and the retention and proper management of boundary tree vegetation. The score should be entered as + rather than -/?. SA Objective 15: In respect of land to the west of Biddulph Valley Way, the assessment states Increased population of both the town and the District may have a positive effect and the score is entered +. The same entry should be applied to BD062.		
SA42	MRS Rebecca Lea		The use of the northern section of BD117 (football field etc.) would result in the loss of open space without suitable replacement.	No amendment required	Please see response to SA41.
SA64	K Morrell		With regard to Paragraph 11.2 (SA Objective 8), the development of Site EN128 would result in an influx of traffic, which would increase exhaust fumes. This would have an adverse effect on air quality.	No amendment required	Please see response to SA63
SA66	V Morrell		With regard to Paragraph 11.2 (SA Objective 8), the development of Site EN128 would result in an influx of traffic, which would increase exhaust fumes. This would have an adverse effect on air quality.	No amendment required	Please see response to SA63.
SA35	Mr Paul Holdcroft		With regard to TR023: Land at former Anzio Camp (under section 15.7), siting pitches here will, by definition, change as travellers move in and out on a frequency that cannot be predicted. This will not assist the cohesion of the small	No amendment required	Blackshaw Moor is defined in the Core Strategy as a smaller village. In line with the proposed development approach no site allocations were proposed as preferred options for consultation in April 2016. An

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			community of Blackshaw Moor. A site of this size could accommodate 10 permanent, affordable (or a lesser number of mixed) properties for occupation by families with a more permanent investment in that community. The lack of services here equally applies to occupants of permanent houses or traveller pitches. With regard to TR024: New Inn Longsdon (under section 15.7), siting pitches here will, by definition, change as travellers move in and out on a frequency that cannot be predicted. This will not assist the cohesion of the small community of Longsdon. A site of this size would accommodate several permanent, affordable (or a lesser number of mixed) properties for occupation by families with a more permanent investment in that community. The lack of services here equally applies to occupants of permanent houses or traveller pitches.		infill boundary was proposed to accommodate delivery of new homes. Similarly no site allocations were proposed as preferred options for consultation in July 2017, however the infill boundary proposal was replaced by a criteria based approach to support sustainable infill development. A proposal for the conversion and extension of the former public house and erection of two dwellings at New Inn, Leek Road, Longsdon was approved on 22/11/2012. (SMD/2012/0669)
SA25	Mr Robert Moseley		Yes. Please ensure that environmental impact, visual impact and noise levels are considered in housing development. Also, please retain trees and hedges where possible.	No amendment required	Support for main significant effects having been correctly identified noted. Local Plan policies DC1 (Design considerations) and NE2 (Trees, woodland and hedgerows) address other issues raised.
<b>Question 3</b> <b>Do you wish to make a comment on the appraisal of one or more Local Plan policy option(s)?</b>					

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SA26	Mr Robert Moseley		Development of the land along Wharf Road on the other side of cycle route 55 is not appropriate, and was not included in the original Plan. Development of this site will set a precedent for development of all land on the other side of route 55. As such, this development site should be removed from the Plan.	No amendment required	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.
SA38	mr stephen thwaite		Objection to 320dpa due to lack of reliable evidence to support it. No information is provided concerning the price that homes will be sold for. The need is for affordable homes.	No amendment required	The SHMA Update report 2017 prepared for the Council by Nathaniel Lichfield & Partners sets out data sources and justifications for the scenarios used to provide estimates of population change and job growth predicted 2014- 2031. Local Plan Policy H3 identifies measures to address the need for affordable housing.
SA16	Mr Paul Holdcroft		Same as Comment SA13. In relation to Bagnall Parish the detail and conclusions in the Sustainability Report do not present a true and fair picture as to how and how far sites BG008, BG014 and BG015 meet the Council's SA Objectives or otherwise. The SA Report should be	No amendment required	Please see response to SA12.

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			<p>amended accordingly. With regard to sites BG008, BG014 and BG015, the following comments apply: With regard to the section Summary of overall assessment and likely significant effects, realistic, true assessments of the site indicate that the creation of a modern mini-estate in Bagnall would bring change for the worse, with adverse effects on the historic nature of the village and landscape. There would be no significant countervailing benefit, failing to meet the Council's Strategic Objectives. Appropriate, limited infill and a modest roadside extension of the village settlement area would, however, better meet aspirations for more housing. With regard to SA Social Objective 2 (BG008), the assessment states that there are no schools in Bagnall. There are also no shops, doctors or chemists. There are three weekday buses per day from Bagnall to Hanley (09.20, 12.55 and 15.55) and two back (12.15 and 14.50) which would not support normal working hours. There are none on Sundays or Bank Holidays. Even if this site (BG008) and sites BG014 and BG015 were fully developed, the additional population would not make the business case for the provision of further transport services or any commercial or</p>		

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			<p>health facilities. Again with regard to SA Social Objective 2, BG008 has been assessed as having a significant negative effect yet the assigned rating is a single negative sign (-) rather than a double negative sign (--). With regard to SA Social Objective 3, there are no health facilities in Bagnall, three buses a day to where there is a GP Surgery (and only two back) and no convenient bus to a hospital. The only practical method of transport to such facilities is by car, motorcycle, taxi or ambulance. Additional population will inevitably add to the use of cars. As such, the assignment of a positive effect to health and the reduction of health inequalities as a result of the development of BG008 is incorrect; it should at best be neutral. With regard to SA Social Objective 4, there is no logic to the contention that a few more properties would lead to less crime. For the reasons given above, it is likely that the site would contain expensive properties, which would pose a greater target for crime. The assessment should not be positive; it should at best be neutral. The financial viability of developing the country site, given the difficult and thus expensive provision of access and services (particularly sewerage) will depend on</p>		

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			<p>the likely return. Rural land granted planning permission and large enough for a mini-estate in an historic village will command a premium price. For a developer to cover high input costs they will have to sell expensive rather than affordable/social /extra care houses. It is a relatively small site and thus there would be little if any scope for loss-producing, affordable housing. The assessment that development of this site would have a significant positive effect on this SA Social Objective 5 is incorrect. With regard to SA Social Objective 6, a small increase in the population will not increase the viability of a bus service because it is highly unlikely that those able to afford a property on a new mini-estate on the edge of an historic rural village would not have a car. The assessment that the development would result in an increase in the use of public transport and a positive effect on the attainment of the Objective, is therefore not justified. Development would, instead, increase the number of journeys by car. As such, the assessment should be a negative one. With regard to SA Environmental Objective 7 (and as set out in relation to SA Social Objective 6 above), the most probable result of building more</p>		



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			<p>properties will be an increased use of cars and thus a negative effect on contribution to climate change. The positive assessment of development should thus be changed to negative. With regard to SA Environmental Objective 8 (and as stated above), additional development will lead to increased use of cars and thus have a negative effect on air quality. The assessment should therefore be negative. With regard to SA Environmental Objective 9, the conclusion of a positive assessment is not justified by the commentary; it is the negative side of indeterminate and should at best be neutral. With regard to SA Environmental Objective 10, the assertion that the site is fairly poorly connected to other biodiverse habitats is not correct. There is a nearby pond with newts, frogs and voles, which is visited by herons. The hedgerows, ditches and bordering trees are home to bats, birds, foxes and badgers. With regard to SA Environmental Objectives 13, 14 and 15: How can building over such green belt natural environment offer opportunities to enhance the natural environment? The building of a modern mini-estate on the skyline edge of an historic village could not fail to change its character and</p>		

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			adversely alter the appearance of the landscape from near or far. The positive assessments are misplaced and should be changed to negative ones. With regard to SA Economic Objective 16, the development of the site is likely to have little effect on economic viability but such as it may, will be to safeguard the viability of businesses in Stoke-on-Trent rather than the Staffordshire Moorlands economy. With regard to SA Economic Objective 18, there are very limited business opportunities in Bagnall, such that a few more residents will not affect them. There is no shop and the pub/restaurant draws most clientele from surrounding towns and suburbs. Bagnall Heights retirement village is still not included within the village boundary, but again, its level of employment is unlikely to be affected by the development of the site. The critical population to support or encourage a shop, industry or further significant employment in or near to Bagnall is well above its present or any proposed levels. The significant positive assessment is not justified.		
SA3	Mr Robert Moseley		The site on Wharf Road, beyond the railway line, was not in the original consultation. As such, it hasn't received the same amount of public	No amendment required	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is

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			scrutiny as the other proposed developments. It should therefore be removed.		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 before being included in the consultation at Preferred Options Stage in 2017. Details of opportunity for public scrutiny are set out in the Consultation Statement.
SA43	MRS Rebecca Lea		The respondent expresses concern regarding the inclusion of BD117 north for development, because it could "have significant effects which could result in a deterioration of health within the community e.g. through loss of leisure and physical recreational facilities". health and wellbeing therefore that the inclusion of BD117 (Policy DSB 3) north for development would have a significant effect which would result in the deterioration of health within the community e.g. through the loss of leisure and physical recreational facilities.	No amendment required	Please see response to SA41.
<b>Question 4</b> <b>Do you wish to make a comment on the appraisal of one or more housing or employment requirement?</b>					

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SA47	Mr G Cooper		No comment.	No amendment required	N/a
SA46	MRS Rebecca Lea		The development of BD117 north would remove the only decent view in the south of the town, leading to a negative contribution to local character and distinctiveness .	No amendment required	Please see response to SA41.
SA27	Mr Robert Moseley		The proposed development site at Wharf Road on the other side of cycle route 55 should be removed from the Plan because it was not included within the original Plan and is located too far into the Green Belt. The land off of the bypass (including its trees and hedges) should be retained as it is, and more Green Belt land added. Boundaries between the housing and fields in this area could follow a similar design to that at Dorset Drive, where green boundaries around water courses and the edges of the estate, make for much more psychologically and physiologically appealing development. This would be a good opportunity for Biddulph and other areas to set a future precedent.	No amendment required	Comments relating to the removal of BDNEW noted. Please see responses to SA3 and SA26. Policy DSB1, which covers the Wharf Road Strategic Development Area, including BDNEW, requires a masterplan incorporating a landscaping plan that includes the submission of landscape and visual impact assessments. The policy also requires the masterplan to incorporate priorities and actions identified in the Council's Green Infrastructure Strategy.
SA4	Mr Robert Moseley		The proposed housing development on Wharf Road, beyond the railway line, should be omitted from the Plan. Additionally, the housing planned in other areas should consider maintaining	No amendment required	Comment re removal of BDNEW noted. Policies in the Local Plan will address green infrastructure and design considerations.

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			hedgerows, trees and green space. This would be good for the environment and people's mental and physical well-being. Adequate space between houses is also essential.		
<b>Question 5</b>					
<b>Do you wish to make a comment on the appraisal of one or more proposed development site option(s)?</b>					
SA5	Mr Robert Moseley		As mentioned previously, the following are good for people's mental and physical well-being: green spaces, retaining trees, hedges, space between properties, sound proof properties and houses that are well-insulated.	No amendment required	Comment that properties with high environmental performance and good landscaping are good for well-being is noted.
SA44	Miss Hannah Walker		Respondent expresses concern regarding the development of Site BD117 because they are keen to see this area preserved and maintained for future generations. Development on this site would need to be sensitive to the area and strive to minimise the impact on the environment. The Green Infrastructure of Biddulph should not be undervalued, and the trees and hedgerows on and surrounding the site should be protected. The Council also need to think about how to support and enhance the recreation and leisure opportunities for the town's residents and visitors, through improvements to accessibility. Improving facilities at the nearby Mill Hayes Sports Ground should be considered.	No amendment required	Local Plan Policy DSB3 requires comprehensive master-planning for the site (Tunstall Road Strategic Development Area) to include provision of a landscaping plan and inclusion of suitable multi-functional green infrastructure in line with the Council's Green Infrastructure Strategy.

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SA18	Mr & Mrs J. A. & C. Hamnett	Director Ken Wainman Associates Ltd	Same as Comment SA17. With regard to para 6.908, the reference to the negative effects of the location in respect of employment areas, ecology and historic assets is misleading. Respondents make the following comments: With regard to employment, the site is well located within the village of Endon, on a major bus route and road linking the Potteries to Leek. The Council's commissioned ecological assessment of potential development sites concludes that the site has fairly low biodiversity value overall apart from a species rich hedgerow and a tree which potentially might contain a bat roost. The report also concludes that the site is poorly connected to the countryside. With regard to historic assets, the nearest listed building (a Grade 2 listed mile post) is 160 metres away. The next nearest listed building (a Grade 2 canal bridge) is over 350 metres away. Neither feature would be adversely affected by development of the site.	No amendment required	Please see response to SA17.
SA28	Mr Robert Moseley		See comments SA26 and SA27. The proposed development site at Wharf Road on the other side of cycle route 55 should be removed from the Plan because it was not included within the original Plan and is located too far into the Green	No amendment required	Please see responses to SA3, SA26 and SA27.

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			Belt. The land off of the bypass (including its trees and hedges) should be retained as it is, and more Green Belt land added. Boundaries between the housing and fields in this area could follow a similar design to that at Dorset Drive, where green boundaries around water courses and the edges of the estate, make for much more psychologically and physiologically appealing development. This would be a good opportunity for Biddulph and other areas to set a future precedent.		
SA48	MRS Rebecca Lea		The outlined Green Belt area of N17 (c) includes recreational facilities. On other plans, only the southern section of BD117 (Policy DSB 3) is designated as preferred mixed use allocation. The respondent requests clarity on whether the northern section will remain open space as it is unclear on the photograph.	No amendment required	Please see response to SA41.
SA17	Mr & Mrs J. A. & C. Hamnett	Director Ken Wainman Associates Ltd	With regard to para 6.908, the reference to the negative effects of the location in respect of employment areas, ecology and historic assets is misleading. Respondents make the following comments: With regard to employment, the site is well located within the village of Endon, on a major bus route and road linking the Potteries to Leek. The Council's commissioned ecological	No amendment required	To help ensure that all SA site assessments were undertaken in a consistent and transparent manner "definitions of significance" were used to guide the determining of significance that is recorded in the appraisal matrix. The overall assessment for EN128 made against each of the SA objectives is consistent with these

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			assessment of potential development sites concludes that the site has fairly low biodiversity value overall apart from a species rich hedgerow and a tree which potentially might contain a bat roost. The report also concludes that the site is poorly connected to the countryside. With regard to historic assets, the nearest listed building (a Grade 2 listed mile post) is 160 metres away. The next nearest listed building (a Grade 2 canal bridge) is over 350 metres away. Neither feature would be adversely affected by development of the site.		definitions of significance. The definitions are published in a table on page 31 of the February 2018 SA report. The symbol representing the overall assessment, and the final summarising paragraph, should be read alongside the commentary on the likely nature of the effects of site allocation recorded against each SA objective and the summary of findings for the site included from page 168 of the February 2018 SA Report.
<b>Question 6</b>					
<b>Do you wish to make a comment on the appraisal of alternative development approaches for Cheadle?</b>					
SA6	Mr Robert Moseley		Respondent does not know Cheadle well but the same environmental principles they mentioned previously apply: green space, retaining trees, hedges where possible and low density housing.	No amendment required	Comment relating to the need to apply high environmental performance standards and good design apply across the District noted. Local Plan Policy DC1 requires development to be designed to respect the site and its surroundings and promote a positive sense of place through (amongst other things) landscaping; the Policy also requires new development to protect the amenity of the area.
SA29	Mr Robert Moseley		Respondent makes the same suggestion as they did for Biddulph (see Comment SA27). Hedges,	No amendment	Please see response to SA6.



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			tree, green space, space between houses and water courses should be retained.	required	
SA15	Mr Paul Holdcroft		Same as Comment SA13. In relation to Bagnall Parish the detail and conclusions in the Sustainability Report do not present a true and fair picture as to how and how far sites BG008, BG014 and BG015 meet the Council's SA Objectives or otherwise. The SA Report should be amended accordingly. With regard to sites BG008, BG014 and BG015, the following comments apply: With regard to the section Summary of overall assessment and likely significant effects, realistic, true assessments of the site indicate that the creation of a modern mini-estate in Bagnall would bring change for the worse, with adverse effects on the historic nature of the village and landscape. There would be no significant countervailing benefit, failing to meet the Council's Strategic Objectives. Appropriate, limited infill and a modest roadside extension of the village settlement area would, however, better meet aspirations for more housing. With regard to SA Social Objective 2 (BG008), the assessment states that there are no schools in Bagnall. There are also no shops, doctors or chemists. There are three weekday buses per day	No amendment required	Please see response to SA12.

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			<p>from Bagnall to Hanley (09.20, 12.55 and 15.55) and two back (12.15 and 14.50) which would not support normal working hours. There are none on Sundays or Bank Holidays. Even if this site (BG008) and sites BG014 and BG015 were fully developed, the additional population would not make the business case for the provision of further transport services or any commercial or health facilities. Again with regard to SA Social Objective 2, BG008 has been assessed as having a significant negative effect yet the assigned rating is a single negative sign (-) rather than a double negative sign (--). With regard to SA Social Objective 3, there are no health facilities in Bagnall, three buses a day to where there is a GP Surgery (and only two back) and no convenient bus to a hospital. The only practical method of transport to such facilities is by car, motorcycle, taxi or ambulance. Additional population will inevitably add to the use of cars. As such, the assignment of a positive effect to health and the reduction of health inequalities as a result of the development of BG008 is incorrect; it should at best be neutral. With regard to SA Social Objective 4, there is no logic to the contention that a few more properties would lead to less</p>		

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			<p>crime. For the reasons given above, it is likely that the site would contain expensive properties, which would pose a greater target for crime. The assessment should not be positive; it should at best be neutral. The financial viability of developing the country site, given the difficult and thus expensive provision of access and services (particularly sewerage) will depend on the likely return. Rural land granted planning permission and large enough for a mini-estate in an historic village will command a premium price. For a developer to cover high input costs they will have to sell expensive rather than affordable/social /extra care houses. It is a relatively small site and thus there would be little if any scope for loss-producing, affordable housing. The assessment that development of this site would have a significant positive effect on this SA Social Objective 5 is incorrect. With regard to SA Social Objective 6, a small increase in the population will not increase the viability of a bus service because it is highly unlikely that those able to afford a property on a new mini-estate on the edge of an historic rural village would not have a car. The assessment that the development would result in an increase in the</p>		

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			<p>use of public transport and a positive effect on the attainment of the Objective, is therefore not justified. Development would, instead, increase the number of journeys by car. As such, the assessment should be a negative one. With regard to SA Environmental Objective 7 (and as set out in relation to SA Social Objective 6 above), the most probable result of building more properties will be an increased use of cars and thus a negative effect on contribution to climate change. The positive assessment of development should thus be changed to negative. With regard to SA Environmental Objective 8 (and as stated above), additional development will lead to increased use of cars and thus have a negative effect on air quality. The assessment should therefore be negative. With regard to SA Environmental Objective 9, the conclusion of a positive assessment is not justified by the commentary; it is the negative side of indeterminate and should at best be neutral. With regard to SA Environmental Objective 10, the assertion that the site is fairly poorly connected to other biodiverse habitats is not correct. There is a nearby pond with newts, frogs and voles, which is visited by herons. The</p>		

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			<p>hedgerows, ditches and bordering trees are home to bats, birds, foxes and badgers. With regard to SA Environmental Objectives 13, 14 and 15: How can building over such green belt natural environment offer opportunities to enhance the natural environment? The building of a modern mini-estate on the skyline edge of an historic village could not fail to change its character and adversely alter the appearance of the landscape from near or far. The positive assessments are misplaced and should be changed to negative ones. With regard to SA Economic Objective 16, the development of the site is likely to have little effect on economic viability but such as it may, will be to safeguard the viability of businesses in Stoke-on-Trent rather than the Staffordshire Moorlands economy. With regard to SA Economic Objective 18, there are very limited business opportunities in Bagnall, such that a few more residents will not affect them. There is no shop and the pub/restaurant draws most clientele from surrounding towns and suburbs. Bagnall Heights retirement village is still not included within the village boundary, but again, its level of employment is unlikely to be affected by the development of the site. The critical population</p>		

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			to support or encourage a shop, industry or further significant employment in or near to Bagnall is well above its present or any proposed levels. The significant positive assessment is not justified.		
SA21	Mr T A J Campbell	Director JMW Planning Limited	The overall approach was flawed due to the assumptions made about the sites from the outset. For example, land which has obvious disadvantages as part of the "package" under consideration resulted in adverse comments, which would not have been applicable had a different group of sites been chosen. Furthermore, subjective views are presented in a way which suggests they deserve greater gravitas than is warranted.	No amendment required	Sites comprising the alternative development approaches for Cheadle were drawn from the SHLAA and / or from sites being promoted as part of the Local Plan process. The "package" of sites proposed to constitute each approach were considered to represent reasonable alternatives for a development approach for Cheadle.
<b>Question 7</b>					
<b>Do you wish to make a comment on the appraisal of alternative development approaches for the Rural Areas?</b>					
SA7	Mr Robert Moseley		Minimum environmental impact (e.g. retaining trees and hedgerows).	No amendment required	Desire for minimal environmental impact in the rural areas noted.
SA49	MRS Rebecca Lea		Respondent does not wish to make any comments on the appraisal of alternative development approaches for the Rural Areas.	No amendment required	No comment is noted.
SA14	Mr Paul Holdcroft		Same as Comment SA13. In relation to Bagnall Parish the detail and conclusions in the Sustainability Report do not present a true and	No amendment required	Please see response to SA12.

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			<p>fair picture as to how and how far sites BG008, BG014 and BG015 meet the Council's SA Objectives or otherwise. The SA Report should be amended accordingly. With regard to sites BG008, BG014 and BG015, the following comments apply: With regard to the section Summary of overall assessment and likely significant effects, realistic, true assessments of the site indicate that the creation of a modern mini-estate in Bagnall would bring change for the worse, with adverse effects on the historic nature of the village and landscape. There would be no significant countervailing benefit, failing to meet the Council's Strategic Objectives. Appropriate, limited infill and a modest roadside extension of the village settlement area would, however, better meet aspirations for more housing. With regard to SA Social Objective 2 (BG008), the assessment states that there are no schools in Bagnall. There are also no shops, doctors or chemists. There are three weekday buses per day from Bagnall to Hanley (09.20, 12.55 and 15.55) and two back (12.15 and 14.50) which would not support normal working hours. There are none on Sundays or Bank Holidays. Even if this site (BG008) and sites BG014 and BG015 were fully</p>		

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			<p>developed, the additional population would not make the business case for the provision of further transport services or any commercial or health facilities. Again with regard to SA Social Objective 2, BG008 has been assessed as having a significant negative effect yet the assigned rating is a single negative sign (-) rather than a double negative sign (--). With regard to SA Social Objective 3, there are no health facilities in Bagnall, three buses a day to where there is a GP Surgery (and only two back) and no convenient bus to a hospital. The only practical method of transport to such facilities is by car, motorcycle, taxi or ambulance. Additional population will inevitably add to the use of cars. As such, the assignment of a positive effect to health and the reduction of health inequalities as a result of the development of BG008 is incorrect; it should at best be neutral. With regard to SA Social Objective 4, there is no logic to the contention that a few more properties would lead to less crime. For the reasons given above, it is likely that the site would contain expensive properties, which would pose a greater target for crime. The assessment should not be positive; it should at best be neutral. The financial viability of</p>		



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			<p>developing the country site, given the difficult and thus expensive provision of access and services (particularly sewerage) will depend on the likely return. Rural land granted planning permission and large enough for a mini-estate in an historic village will command a premium price. For a developer to cover high input costs they will have to sell expensive rather than affordable/social /extra care houses. It is a relatively small site and thus there would be little if any scope for loss-producing, affordable housing. The assessment that development of this site would have a significant positive effect on this SA Social Objective 5 is incorrect. With regard to SA Social Objective 6, a small increase in the population will not increase the viability of a bus service because it is highly unlikely that those able to afford a property on a new mini-estate on the edge of an historic rural village would not have a car. The assessment that the development would result in an increase in the use of public transport and a positive effect on the attainment of the Objective, is therefore not justified. Development would, instead, increase the number of journeys by car. As such, the assessment should be a negative one. With</p>		

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			<p>regard to SA Environmental Objective 7 (and as set out in relation to SA Social Objective 6 above), the most probable result of building more properties will be an increased use of cars and thus a negative effect on contribution to climate change. The positive assessment of development should thus be changed to negative. With regard to SA Environmental Objective 8 (and as stated above), additional development will lead to increased use of cars and thus have a negative effect on air quality. The assessment should therefore be negative. With regard to SA Environmental Objective 9, the conclusion of a positive assessment is not justified by the commentary; it is the negative side of indeterminate and should at best be neutral. With regard to SA Environmental Objective 10, the assertion that the site is fairly poorly connected to other biodiverse habitats is not correct. There is a nearby pond with newts, frogs and voles, which is visited by herons. The hedgerows, ditches and bordering trees are home to bats, birds, foxes and badgers. With regard to SA Environmental Objectives 13, 14 and 15: How can building over such green belt natural environment offer opportunities to enhance the</p>		

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			<p>natural environment? The building of a modern mini-estate on the skyline edge of an historic village could not fail to change its character and adversely alter the appearance of the landscape from near or far. The positive assessments are misplaced and should be changed to negative ones. With regard to SA Economic Objective 16, the development of the site is likely to have little effect on economic viability but such as it may, will be to safeguard the viability of businesses in Stoke-on-Trent rather than the Staffordshire Moorlands economy. With regard to SA Economic Objective 18, there are very limited business opportunities in Bagnall, such that a few more residents will not affect them. There is no shop and the pub/restaurant draws most clientele from surrounding towns and suburbs. Bagnall Heights retirement village is still not included within the village boundary, but again, its level of employment is unlikely to be affected by the development of the site. The critical population to support or encourage a shop, industry or further significant employment in or near to Bagnall is well above its present or any proposed levels. The significant positive assessment is not justified.</p>		

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SA30	Mr Robert Moseley		The building materials and design of new developments should be in line with the local area, as well as the provision of space. This would set a good precedent for future developments, and would ensure that developers are not able to do what they please.	No amendment required	Local Plan Policy DC1 requires all development to be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area.
<b>Question 8</b> <b>Do you wish to make a comment on the monitoring proposals, in particular the sustainability effects to be monitored and the information to be collected, including by whom and when?</b>					
SA8	Mr Robert Moseley		No.	No amendment required	No comment on monitoring proposals is noted.
SA31	Mr Robert Moseley		No.	No amendment required	Please see response to SA8. (No comment on monitoring proposals noted.)
SA22	Mr T A J Campbell	Director JMW Planning Limited	The only mention of housing in the Report relates to affordable housing, which is only part of the provision the Local Plan has to deliver. Yet the government requires the planning system to substantially increase the provision of all types of housing, and this needs to be monitored regularly. The failure to include this in the list of factors to be examined is a serious omission.	Amendment	To ensure monitoring covers the significant environmental, economic and social effects of implementing the Local Plan, in the final row of Table 10.1, for the entry under what needs to be monitored "Housing which meets local needs" add an additional indicator following "Number of affordable housing completions": Net additional dwellings for each year over plan period .
SA50	MRS Rebecca Lea		The respondent does not wish to make a comment in regards to question 8.	No amendment	No comment is noted.

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				required	
<b>Question 9</b>					
<b>Do you wish to make any other comments about this SA Report?</b>					
SA13	Mr Paul Holdcroft		In relation to Bagnall Parish the detail and conclusions in the Sustainability Report do not present a true and fair picture as to how and how far sites BG008, BG014 and BG015 meet the Council's SA Objectives or otherwise. The SA Report should be amended accordingly. With regard to sites BG008, BG014 and BG015, the following comments apply: With regard to the section "Summary of overall assessment and likely significant effects, realistic, true assessments of the site indicate that the creation of a modern mini-estate in Bagnall would bring change for the worse, with adverse effects on the historic nature of the village and landscape. There would be no significant countervailing benefit, failing to meet the Council's Strategic Objectives. Appropriate, limited infill and a modest roadside extension of the village settlement area would, however, better meet aspirations for more housing. With regard to SA Social Objective 2 (BG008), the assessment states that there are no schools in Bagnall. There are also no shops, doctors or chemists. There are	No amendment required	Please see response to SA12.

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			<p>three weekday buses per day from Bagnall to Hanley (09.20, 12.55 and 15.55) and two back (12.15 and 14.50) which would not support normal working hours. There are none on Sundays or Bank Holidays. Even if this site (BG008) and sites BG014 and BG015 were fully developed, the additional population would not make the business case for the provision of further transport services or any commercial or health facilities. Again with regard to SA Social Objective 2, BG008 has been assessed as having a significant negative effect yet the assigned rating is a single negative sign (-) rather than a double negative sign (--). With regard to SA Social Objective 3, there are no health facilities in Bagnall, three buses a day to where there is a GP Surgery (and only two back) and no convenient bus to a hospital. The only practical method of transport to such facilities is by car, motorcycle, taxi or ambulance. Additional population will inevitably add to the use of cars. As such, the assignment of a positive effect to health and the reduction of health inequalities as a result of the development of BG008 is incorrect; it should at best be neutral. With regard to SA Social Objective 4, there is no logic to the contention</p>		

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			<p>that a few more properties would lead to less crime. For the reasons given above, it is likely that the site would contain expensive properties, which would pose a greater target for crime. The assessment should not be positive; it should at best be neutral. The financial viability of developing the country site, given the difficult and thus expensive provision of access and services (particularly sewerage) will depend on the likely return. Rural land granted planning permission and large enough for a mini-estate in an historic village will command a premium price. For a developer to cover high input costs they will have to sell expensive rather than affordable/social /extra care houses. It is a relatively small site and thus there would be little if any scope for loss-producing, affordable housing. The assessment that development of this site would have a significant positive effect on this SA Social Objective 5 is incorrect. With regard to SA Social Objective 6, a small increase in the population will not increase the viability of a bus service because it is highly unlikely that those able to afford a property on a new mini-estate on the edge of an historic rural village would not have a car. The assessment that the</p>		

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			<p>development would result in an increase in the use of public transport and a positive effect on the attainment of the Objective, is therefore not justified. Development would, instead, increase the number of journeys by car. As such, the assessment should be a negative one. With regard to SA Environmental Objective 7 (and as set out in relation to SA Social Objective 6 above), the most probable result of building more properties will be an increased use of cars and thus a negative effect on contribution to climate change. The positive assessment of development should thus be changed to negative. With regard to SA Environmental Objective 8 (and as stated above), additional development will lead to increased use of cars and thus have a negative effect on air quality. The assessment should therefore be negative. With regard to SA Environmental Objective 9, the conclusion of a positive assessment is not justified by the commentary; it is the negative side of indeterminate and should at best be neutral. With regard to SA Environmental Objective 10, the assertion that the site is fairly poorly connected to other biodiverse habitats is not correct. There is a nearby pond with newts, frogs</p>		



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			<p>and voles, which is visited by herons. The hedgerows, ditches and bordering trees are home to bats, birds, foxes and badgers. With regard to SA Environmental Objectives 13, 14 and 15: How can building over such green belt natural environment offer opportunities to enhance the natural environment? The building of a modern mini-estate on the skyline edge of an historic village could not fail to change its character and adversely alter the appearance of the landscape from near or far. The positive assessments are misplaced and should be changed to negative ones. With regard to SA Economic Objective 16, the development of the site is likely to have little effect on economic viability but such as it may, will be to safeguard the viability of businesses in Stoke-on-Trent rather than the Staffordshire Moorlands economy. With regard to SA Economic Objective 18, there are very limited business opportunities in Bagnall, such that a few more residents will not affect them. There is no shop and the pub/restaurant draws most clientele from surrounding towns and suburbs. Bagnall Heights retirement village is still not included within the village boundary, but again, its level of employment is unlikely to be affected by the</p>		

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			development of the site. The critical population to support or encourage a shop, industry or further significant employment in or near to Bagnall is well above its present or any proposed levels. The significant positive assessment is not justified.		
SA9	Mr Robert Moseley		Low density housing, green space and retaining trees and hedgerows keeps the impact low.	No amendment required	Comment noted regarding low density housing, green space and retaining trees and hedgerows to minimise impacts of development.
SA20	Mr John Wilshaw		No comment.	No amendment required	No comment made.
SA32	Mr Robert Moseley		No.	No amendment required	No other comment to be made on SA report noted.
SA51	MRS Rebecca Lea		The removal of recreational facilities in BD117 north would have a detrimental effect on the local community.	No amendment required	Please see response to SA41.
<b>Question 10</b> <b>Does this February 2018 SA Report, together with the SA Scoping Report, provide sufficient information to demonstrate that an appropriate SA has been carried out of the Staffordshire Moorlands Local Plan?</b>					
SA52	MRS Rebecca Lea		The outlined Green Belt area of N17 (c) includes recreational facilities. On other plans, only the southern section of BD117 is designated as preferred mixed use allocation. The respondent	No amendment required	Please see response to SA41.

Response ID	Full Name	Organisation Details	Summary of response	Is an amendment to the SA report required in the light of the response?	Why is an amendment to the SA report required or not?
			requests clarity on whether the northern section will remain open space.		
SA10	Mr Robert Moseley		The SA Report is too wordy and too protracted, and there is not enough succinct clear communication. The SA Report should be written in a way that targets the lay person with around 10 minutes thinking time.	No amendment required	It is accepted that the SA report is long and complex, however the content is largely determined by Regulations and planning guidance. A non-technical summary is included.
SA33	Mr Robert Moseley		Yes.	No amendment required	View that sufficient information has been provided to demonstrate that an appropriate SA has been carried out is noted.
<b>Question 11</b> <b>Do you wish to make a comment on either or both of the supporting documents: the Habitats Regulations Assessment report of the Staffordshire Moorlands Local Plan February 2018, or the Equality Impact Assessment report of the Local Plan at this stage? Both these reports are available alongside this SA Report.</b>					
SA34	Mr Robert Moseley		No.	No amendment required	No comments to be made on the accompanying HRA report or the Equality Impact Assessment is noted.
SA45	Mr G Cooper		The respondent states that the Council has produced a good Plan because they have listened to previous consultation responses, and scrapped large scale development in the large villages in favour of smaller scale development. An overall well done from the respondent is expressed.	No amendment required	Support noted.
SA36	Mr Paul Holdcroft		The respondent states that the present site assessments were made under the Habitats	No amendment	Ecological assessments of BG014 and BG015 were undertaken by Lockwood Hall

Response ID	Full Name	Organisation Details	Summary of response	Is an amendment to the SA report required in the light of the response?	Why is an amendment to the SA report required or not?
			Regulations Assessment in 2014 as the 2018 HRA was not available at the time the SA was submitted for consultation. In relation to Sites BG014 and BG015, the 2018 report should involve a discussion with residents whose properties border or overlook these site in order to obtain a true picture of the wildlife extant there as the 2014 report no longer represents that.	required	Associates Ltd (site references FID102 and FID103) and findings published in the Council's evidence base report: Extended Phase 1 Habitat surveys; July 2015. The Council has no plans to commission further ecological assessment of these sites.
SA11	Mr Robert Moseley		This is all very well but the implementation of the Plan is most important. We all know what promises developers make to get land but holding them accountable to the community is another thing.	No amendment required	The importance of implementing the recommendations of the HRA and EqIA is noted.