

# Staffordshire Moorlands Local Plan

## Duty to Co-operate Statement



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Introduction

### 1 Introduction

- **1.1** Strategic planning is a key element of plan-making to ensure that social, economic and environmental issues are properly addressed at a larger then local scale. This is because the actions of people, businesses and services have consequences which go beyond a single local authority area.
- 1.2 In order to address strategic planning issues, relevant local authorities and other public bodies are required to work together through the 'duty to co-operate' as set out in the Localism Act 2011 and described further in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). The purpose of the duty is to ensure that local authorities and public bodies that are critical to plan making cooperate with each other and that they are involved in continual constructive and active engagement as part of the planning process
- 1.3 The purpose of this Statement is to provide an overview of how the Council has met its obligations under the Duty to Cooperate with regard to the Staffordshire Moorlands Local Plan. The 'duty to co-operate' is a legal requirement of the plan preparation process and this Statement seeks to evidence the work that has been done in preparing the Local Plan and how this will be taken forward in future plan-making.
- **1.4** The remainder of this statement is structured around the following sections:
- Section 2 (Background and context) this sets out the statutory and policy requirements for the Duty to Co-operate
- Section 3 (Cooperation and partnership working) provides details of cooperation matters and partnership working that have shaped the Local Plan and will assist in its delivery
- Section 4 (Outcomes and future arrangements) provides a summary of outcomes of cooperation and how they will be implemented over the plan period
- Appendix 1 (Statements of Common Ground) provides copies of Statements of Common Ground as of June 2018
- Appendix 2 (Minutes of meetings) records matters discussed at meetings regarding strategic matters (note - not all meetings with undertaken during the preparation of the Local Plan have been recorded)
- Appendix 3 (Correspondence) relevant samples of correspondence with organisiations

**Background and Context** 

### 2 Background and Context

### Localism Act 2011

2.1 Section 110 of the Localism Act sets out a 'duty to cooperate' for local planning authorities and other prescribed bodies in relation to planning for sustainable development when preparing Development Plan Documents, other Local Development Documents and other plans relating to strategic matters. Strategic matters are defined in the Act as; "(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and (b) sustainable development or use of land in a two-tier area if the development or use (i) is a county matter, or (ii) has or would have a significant impact on a county matter".

### **2.2** Specifically, the duty:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a County Council;
- Requires that Councils set out planning policies to address such issues;
- Requires that Councils and public bodies to 'engage constructively, actively and on an ongoing basis' to develop strategic policies; and
- Requires Councils to consider joint approaches to plan making.
- 2.3 The 'prescribed bodies' which the Council has a duty to co-operate with are set out in the Town & Country Planning (Local Planning) (England) Regulations 2012 as amended by The National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013. In addition to Local Planning Authorities, those relevant to Staffordshire Moorlands District Council are:
- Environment Agency
- Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- Civil Aviation Authority
- Homes and Communities Agency
- Clinical commissioning groups established under section 14D of the National Health Service Act 2006
- National Health Service Commissioning Board
- Office of Rail Regulation
- Highway authorities within the meaning of section 1 of the Highways Act 1980 (Highways England and Staffordshire County Council
- **2.4** Whilst Local Enterprise Partnerships and Local Nature Partnerships are not subject to the Duty to Cooperate, local planning authorities should have regard to their activities.

### **National Planning Policy Framework and Planning Guidance**

2.5 The NPPF specifies national planning policies for England. Paragraphs 178 to 181 emphasise the importance of planning strategically to address issues across administrative boundaries, particularly priorities that relate to:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape
- 2.6 The outcome of collaborative working on such priorities should be reflected in the Local Plan. The preparation of joint policies, strategies or a Memorandum of Understanding / Statements of Common Ground are all advocated as means of ensuring that an agreed position will continue to be adhered to during the plan period.
- **2.7** Compliance with the Duty to Co-operate is necessary for the Local Plan to be adopted. As such, the Planning Inspector will consider this issue at the Examination of the Local Plan. The Council is also required to monitor and report on actions undertaken under the Duty to Co-operate on a annual basis.

### **Emerging National Policy**

- 2.8 In 2017, the Government consultation document "Planning for the Right Homes in the Right Places" re-iterated the importance of co-operation during Local Plan preparation. This was carried forward into the draft text of the revised National Planning Policy Framework published for consultation in March 2018. To help ensure more effective co-operation, the consultation proposed that local authorities should prepare Statement of Common Ground with relevant bodies to establish the cross-boundary matters that require co-operation and how this has been undertaken to date and proposals for future co-operation and updates.
- 2.9 The geographical area to which the Statement of Common Ground applies would be dependent on the planning issues to be considered with housing market areas being cited as a potential starting point. The revised Framework is currently expected to be finalised by the end of Summer 2018.

Co-operation and Partnership Working

### 3 Co-operation and Partnership Working

### Strategic matters

- **3.1** The NPPF specifies that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly strategic priorities. The nature and scope of cross boundary cooperation will depend on the spatial relationship between public bodies. For example, shared housing market or travel to work areas or shared infrastructure.
- **3.2** The latest Strategic Housing Market Assessment (2014) and subsequent update (2017) recommended that as the District is not a fully self contained housing market area, the Council should co-operate on housing matters with adjoining areas, particularly Stoke-on-Trent.
- 3.3 The Employment Land Requirement Study (2014) indicated that the District fell within the wider Functional Economic Market Area of Stoke-on-Trent and that co-operation was undertaken accordingly.
- 3.4 Common issues shared with the Peak District National Park Authority and partners across the wider Peak District such as the need to project the environment are also of significance.
- 3.5 Staffordshire County Council is also a key organisation for Local Plan preparation and delivery in the District, particularly in terms of its capacity as the local highways authority, waste and minerals planning authority, lead local flood authority and provider of other infrastructure including education. Co-ordination of infrastructure provision and other technical input into the Local Plan and supporting documents such as the Infrastructure Delivery Plan has also been undertaken with the relevant bodies such as the Environment Agency, Historic England and Highways England.
- 3.6 In 2008 the Council entered into a Strategic Alliance with the neighbouring authority of High Peak Borough Council. The aims of the alliance are to achieve: Significantly improved quality of life for residents, Value for money, Excellent customer service and High levels of public recognition and satisfaction
- **3.7** The two Authorities do not share many strategic planning matters, in part due to their separation by the Peak District National Park, topography and differing city regions of influence. Nonetheless, there are some similarities between the two areas and this presents opportunities for closer joint working across many service areas.
- **3.8** The Local Plan identifies eleven Strategic Objectives (SO) that it seeks to achieve. The following table provides an overview of the spatial relationship of each Duty to Co-operate body with Staffordshire Moorlands, associated cooperation matters, engagement methods and Local Plan Strategic Objectives that co-operation supports.

Organisation	Spatial relationship	Strategic matters	Strategic	Engagement methods
			Objectives	
Staffordshire County Council	Local highways authority  Waste and minerals planning authority Lead local flood authority Key infrastructure/service provider including; education, libraries, transport and green infrastructure Land owner in District Member of Constellation Partnership	Ensuring that County Council led SO1, SO2, S infrastructure has sufficient capacity to SO10, SO11 accommodate planned growth Need for coordinated polices and designations in respect of the Local Plan, infrastructure, minerals and waste Consideration of emerging strategy for the Constellation Partnership	600	SO1, SO2, SO9, Meetings, partnership SO10, SO11 working, joint evidence gathering, consultation
Peak District National Park Authority	Local planning authority for part of the Districter Partly lies within same housing market and functional economic areas  Parish boundaries span the border of the National Park and Local Plan area  Shared infrastructure e.g. Green Infrastructure  SO1, SO2, SO3, SO4, SO7, SO8, SO9 Meetings, joint evidence gathering, consultation	of the District  requirements  market and  • Consideration of the landscape setting and nature conversation of the National Park der of the  • Co-ordination of shared infrastructure  • Joint support for neighbourhood planning where applicable  8, SO9  9, SO9		SO1, SO2, SO3, Meetings, joint evidence SO4, SO7, SO8, gathering, consultation SO9
Stoke-on-Trent City Council	Adjoining local planning authority     Housing market and functional economic area relationships     Shared infrastructure e.g. A53     Shared Green Belt boundary	<ul> <li>Working towards meeting development requirements</li> <li>Co-ordination of shared infrastructure e.g. growth on A50</li> <li>Co-ordination of Green Belt reviews</li> <li>Consideration of Blythe Vale Strategic Site</li> </ul>	SO6, SO3, SO4,	SO1, SO3, SO4, Meetings, joint evidence SO6, SO11 gathering, partnership working, consultation

Organisation	Spatial relationship	Strategic matters	Strategic Objectives	Engagement methods
	•Member of Constellation Partnership	<ul> <li>Consideration of emerging strategy for the Constellation Partnership</li> </ul>		
Newcastle-under-Lyme Borough Council	•Adjoining local planning authority •Housing market and functional economic area relationships	<ul> <li>Working towards meeting development requirements</li> <li>Co-ordination of shared infrastructure</li> </ul>	SO1, SO3, SO4, SO6, SO11	SO1, SO3, SO4, Meetings, joint evidence SO6, SO11 gathering, partnership working, consultation
	Shared infrastructure Shared Green Belt boundary  Member of Constellation Partnership	<ul> <li>Co-ordination of Green Belt reviews</li> <li>Consideration of emerging strategy for the Constellation Partnership</li> </ul>		
Stafford Borough Council	Adjoining local planning authority     Housing market and functional economic area relationships     Shared infrastructure e.g. A50     Shared Green Belt boundary     Member of Constellation Partnership	Working towards meeting development requirements     Co-ordination of shared infrastructure e.g. growth on A50     Co-ordination of Green Belt reviews     Consideration of Blythe Vale Strategic Site     Consideration of emerging strategy for the Constellation Partnership	SO6, SO3, SO4,	SO1, SO3, SO4, Meetings, joint evidence SO6, SO11 gathering, partnership working, consultation
East Staffordshire Borough Council	•Adjoining local planning authority  •Shared infrastructure e.g. A50  •Borough includes parts of Churnet Valley	•Co-ordination of shared infrastructure e.g. SO2, SO7, traffic implications of Alton Towers and growth SO9, SO11 on A50     •Consideration of Blythe Vale Strategic Site Initiatives to conserve and improve the Churnet Valley	SO8,	SO2, SO7, SO8, Meetings, partnership SO9, SO11 working, joint evidence gathering, consultation

Organisation	Spatial relationship	Strategic matters	Strategic Objectives	Engagement methods
Cheshire East Council	Cheshire East Council •Adjoining local planning authority •Shared infrastructure e.g. A527	•Co-ordination of shared infrastructure e.g. Green Infrastructure	SO11	SO7, SO9, SO11 Meetings, partnership working, joint evidence
		<ul> <li>Co-ordination of Green Belt reviews</li> </ul>		
	inership	<ul> <li>Consideration of emerging strategy for the Constellation Partnership</li> </ul>		
High Peak Borough Council	<ul> <li>Adjoining local authority (planning areas separated by the Peak District National Park)</li> <li>Shared infrastructure (A53)</li> </ul>	Shared need for consideration of setting SO2, SO8, SO9 Joint staff and and nature conservation of Peak District National Park	3 SO2, SO8, SO9	Joint staff and co-ordination of resources
Derbyshire Dales District Council	<ul> <li>Adjoining local authority (planning areas separated by the Peak District National Park)</li> <li>Shared infrastructure (A53</li> </ul>	Shared need for consideration of setting SO2, SO8, SO9 and nature conservation of Peak District National Park		Consultation, meeting
Environment Agency	<ul> <li>Statutory body with responsibility for a range of environmental issues including; flood risk, water quality and climate change</li> </ul>	Input on flood risk and environmental matters including Churnet Valley	SO2, SO8	Consultation, ongoing dialogue
Historic England	<ul> <li>Statutory body with responsibility for the historic environment</li> </ul>	<ul> <li>Input on historic environment matters including Churnet Valley</li> </ul>	SO7, SO8, S09	Consultation, ongoing dialogue
Natural England	<ul> <li>Statutory body with responsibility for the conservation, enhancement and management of the natural environment</li> </ul>	Input on environmental matters including Churnet Valley	SO2, SO8, SO9	Consultation, ongoing dialogue
Civil Aviation Authority	<ul> <li>Statutory body with responsibility for management of UK airspace</li> </ul>	No strategic matters identified		Consultation
Homes England	<ul> <li>Agency with responsibilities for enabling housing and regeneration</li> </ul>	<ul> <li>Partner in the delivery of housing, including affordable housing</li> </ul>	SO4, SO6	Consultation, ongoing dialogue
North Staffordshire and Stoke-on-Trent Clinical Commissioning Groups	Plan and purchase health care for residents	Provision of health care in co-ordination S10 with Local Plan	S10	Consultation, meeting

Organisation	Spatial relationship	Strategic matters	Strategic Objectives	Engagement methods
National Health Service Commissioning Board	<ul> <li>Responsible for support the development of CCGs and providing</li> </ul>	<ul> <li>Provision of health care in co-ordination S10 with Local Plan</li> </ul>	S10	Consultation, discussions
(NHS England)	specialised services and primary care.			
Office of Rail Regulation	<ul> <li>Regulate the rail industry in the UK</li> </ul>	<ul> <li>Consideration of railway provision at Blythe Bridge</li> </ul>	SO11	Consultation
Highways England	<ul> <li>Highways authority for A50</li> </ul>	<ul> <li>Consideration of impacts of growth on SO11 A50</li> </ul>	SO11	Consultation, meeting
Stoke and Staffordshire	<ul> <li>Local Enterprise Partnership Stoke and</li> </ul>	<ul> <li>Local Plan should reflect and assist in SO3, SO5, SO6, Consultation</li> </ul>	SO3, SO5, SO6,	Consultation
Local Enterprise Partnership (LEP) <sup>(1)</sup>	for Staffordshire	delivering economic objectives	207	
Peak District Local	Partnership with role in improving the local	<ul> <li>Local Plan should assist in delivering</li> </ul>	SO2, SO8, SO9 Consultation	Consultation
Nature Partnership (LNP)	natural environment of the Peak District	LNP objectives		
Staffordshire Local	Partnership with role in improving the local	Local Plan should assist in delivering SO2, SO8, SO9	SO2, SO8, SO9	Consultation, meetings
Nature Partnership (LNP)	natural environment of Staffordshire	LNP objectives		

Table 3.1 Spatial relationships and strategic matters

1. Note - LEP and LNP are not subject to the Duty to Co-operate but regard should be given to them

### Partnership working

- **3.9** The District Council has a longstanding record of working with partner organisations that goes beyond the Duty to Cooperate requirement specified in the 2011 Localism Act. Indeed, in many cases cooperation on planning and related matters with partners pre-dates the Act. This includes joint working with neighbouring authorities on collecting evidence and infrastructure delivery.
- Staffordshire Development Planning Officers Group (SDOG) planning officers working group that facilities co-ordination on planning matters between local planning authorities and the County Council.
- Constellation Partnership a grouping of local authorities and Local Enterprise Partnerships in Cheshire and north Staffordshire that have come together to maximise the potential benefits to the area arising from the proposed HS2 Hub Station at Crewe and related economic growth opportunities up to the year 2040. Whilst a strategy has yet to be published, the Local Plan will seek to provide support to this initiative insofar as it relates to the timescales for the Local Plan up to the year 2031.
- Churnet Valley Living Landscape Partnership includes Natural England, Environment Agency, Staffordshire County Council, Historic England, Staffordshire Moorlands District Council and East Staffordshire Borough Council. Aims to restore and conserve the heritage and natural environment of the valley
- Alton Towers Resort Transport Liaison Group includes Staffordshire County Council, East Staffordshire Borough Council and public transport operators and serves to co-ordinate improvements to address impacts associated with the Alton Towers Resort.

### **Evidence base**

**3.10** Numerous joint evidence base studies have shaped the Local Plan and those of neighbouring authorities. In addition, when not directly involved in relevant studies, neighbouring authorities and other stakeholders have also been consulted on the approach and initial findings of evidence base studies to ensure that a consistent approach. A summary of joint working on the Local Plan evidence base is provided below.

Study	Study partners	Consultees
Strategic Housing Market	High Peak Borough Council	Neighbouring local planning authorities
Assessment		
Employment Land Study	High Peak Borough Council	Neighbouring local planning authorities
Updated Gypsy and Traveller	Stoke-on-Trent City	Neighbouring local planning authorities
Needs Assessment	Council,	
	Newcastle-under-Lyme	
	Borough Council, Stafford	
	Borough Council	
Retail Study	High Peak Borough Council	
Level 1 Strategic Flood Risk	Environmental Agency,	Highways Agency, neighbouring local
Assessment Update	Staffordshire County	authorities, utilities companies
	Council	
Ecological Study and update		Natural England (data records)
Cheadle Town Centre Transport	Staffordshire County	
Study and Phase 2 Assessment	Council	
Green Belt Review and Updates		Neighbouring local planning authorities
Strategic Housing Land		Neighbouring local planning authorities,
Availability Assessment (SHLAA)		Staffordshire County Council, Highways
		Agency, English Heritage, Natural
		England, Environment Agency, Historic

Study	Study partners	Consultees
		England, Homes and Communities
		Agency, North Staffordshire and
		Stoke-on-Trent Clinical Commissioning
		Groups, NHS England, Office of Rail
		Regulation
Strategic Housing and Economic		
` '	Authority, High Peak	
	Borough Council	
	Staffordshire County	Neighbouring local authorities and other
	Council, Peak District	statutory bodies
	National Park Authority,	
	Staffordshire Local Nature	
	Partnership, Environment	
	Agency, Natural England	
Open Space Study and Playing		Staffordshire County Council
Pitch Strategy		Stanordonne Godnity Godnon
Development Capacity, Viability		Staffordshire County Council, Highways
and Community Infrastructure		England, Network Rail, North
Levy Study, including		Staffordshire and Stoke-on-Trent Clinical
		Commissioning Groups, NHS England
Infrastructure Delivery Plan		
Habitats Regulations Assessment		Staffordshire County Council, Derbyshire
		County Council (provision of cross
		boundary traffic data), Natural England
Landscape, Local Green Space		Peak District National Park Authority,
and Heritage Impact Assessment		Historic England, Natural England,
		Staffordshire County Council

Table 3.2 Evidence base

Outcomes and Future Arrangements

### **4 Outcomes and Future Arrangements**

**4.1** The outcome of the co-operation undertaken during the preparation of the Local Plan in terms of its influence on the plan, its delivery and the plans and strategies of partners are specified in the table below. Details of how these outcomes will be taken forward and implemented during the plan period are also recorded.

Organisation	Strategic matters	Outcomes		Future arrangements
Staffordshire County Council (SCC)	Ensuring that County Council led infrastructure has sufficient capacity to	• • 6 5	Plan spatial strategy (Policies SS2 and SS3) seeks centrate development in towns and larger villages are more sustainable in terms of infrastructure	mplementation and monitoring of elevant policies
	accommodate planned growth	• 4 = 8		Consultation on planning applications Ongoing dialogue to deliver infrastructure in line with the Local Plan and IDP
		₽ <u>₽ Έ </u> <u>₽</u> Ε	Policy SS12 (Planning Obligations and CIL) makes provisions for developers to pay towards SCC related Further details in infrastructure. Commitment for further joint consideration Common Ground of funding arrangements and cross boundary education movements	Further details in future Statement of Common Ground
		₽ 등 호 €	Policies update to reflect SCC advice and evidence including; DC1 (Design Considerations) in respect of broadband and SS7 (Cheadle Area Strategy) / DSC3 (Mobberley Farm) in relation to transport infrastructure	
		• ε <u>σ</u>	Staffs Moorlands Infrastructure Delivery Plan includes measures identified by SCC including additional school provision	
		<b>₹</b> 8 .⊑	Alton Towers Resort Transport Liaison Group co-ordinates transport improvements to mitigate traffic impacts under terms of legal agreement	
	Need for coordinated polices and designations in respect of the Local Plan	•	Policy SD1 (Sustainable Use of resources) address Implementation aminerals and waste issues to support Minerals and wasterelevant policies Plan.	Implementation and monitoring of relevant policies Consultation on planning applications

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Olganisation	Strategic matters	ects requirements of Lead	Continued joint working and liaison on
		Local Flood Authority (SCC)	site delivery
		<ul> <li>Site allocated to enable additional school provision including ADD01, CH001/CH132 &amp; LE140</li> </ul>	
	Consideration of emerging	Joint work towards emerging strategy  Co	Continued work through Constellation
	Constellation Partnership	Allocation of Blythe Vale site which may support strategy	
Peak District National Park Authority	Working towards meeting development	Objectively assessed need for development of housing Sharing of monitoring data and and employment relates to whole District.	Sharing of monitoring data and evidence
	requirements	National Park Authority agree to inclusion of a 100 consultation on planning application dwelling allowance in the Local Plan. Plan to take account of likely completions within the District up to the limplementation of relevant policies.	Consultation on planning applications Implementation of relevant policies
		year 2031 (supporting text to Policy SS4) (1) Fu  Employment land delivery in the National Park within Co	Further details in Statement of Common Ground (Appendix 1)
		the District is likely to be negligible and so no allowance is made for this.	
		<ul> <li>Joint Strategic Housing and Economic Land Availability Assessment</li> </ul>	
	Consideration of the landscape setting	Policies SS1 (Development Principles), (SD2 Low Implementation of relevant policies Carbon Energy), DC3 (Landscape & Settlement Setting)     outline policy to address impacts on the National Park   Consultation on planning applications	Implementation of relevant policies Consultation on planning applications
	and nature conversation of the National Park	<ul> <li>Input on Landscape, Local Green Space and Heritage Further details in Statement of Impact Study which has informed site allocations and policy in respect of mitigation measures</li> </ul>	Further details in Statement of Common Ground (Appendix 1)

Please note - the figure of 100 dwellings within the National Park is an estimate based on past delivery rates and does not represent a housing target for the National Park Authority. Please note - as of June 2018, Statement of Common Ground signed by Leader of SMDC and Planning Policy Manager of PDNPA.

Organication	Strategic matters	Out	Outcomes	Future arrangements
	Co-ordination of shared		nto Green Infrastructure Strategy which in turn	Implementation of relevant policies
	יייי מאו מכוח פ		moins Poncy Co (Green minasudcture)	Joint working through Green Infrastructure Strategy working group
				Further details in Statement of Common Ground (Appendix 1)
	Joint support for neighbourhood planning where applicable		Support given to emerging Leekfrith Neighbourhood Plan	Further details in Statement of Common Ground (Appendix 1)
Stoke-on-Trent City Council (SoTCC)	Working towards meeting development requirements	•	Policy SS4 (Housing and Employment Land Supply) supports growth in Moorlands Staffordshire without undermining emerging Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan	Further details in Statement of Common Ground (Appendix 1)
		•	SMDC enquired whether a site in Stoke-on-Trent near to Biddulph could be allocated in the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan help with the provision of housing for SMDC. SOTCC were unable to support this request as the suggested site lay within the North Staffordshire Green Belt and evidence for exceptional circumstances for the release of that site did not exist. Stoke-on-Trent City Council are not proposing amendments to the North Staffordshire Green Belt as part of the consultation on the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan – Preferred Options Consultation.	
		•	SoTCC unable to assist in meeting SMDC's housing development requirements due to the fact that the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan is in the early stages of preparation and the councils	

Please note: as of June 2018, the Statement of Common Ground has been agreed by Staffordshire Moorlands District Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council.

Organisation	Strategic matters	Outcomes	Future arrangements
		are gathering evidence and consulting on the Preferred Options to meet their own needs. The Joint Local Plan will need to be at a more advanced stage before the councils can consider the needs of adjoining authorities. The Joint Local Plan Preferred Options Consultation identifies a shortfall in housing supply within the Housing Market Area of Stoke-on-Trent and Newcastle-under-Lyme which would need to be resolved before the consideration of housing need arising from Staffordshire Moorlands could be considered.	
		SoTCC unable to assist in meeting SMDC's gypsy and travellers development requirements due to the fact that the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan is in the early stages of preparation and consideration of meeting their own gypsy and traveller needs was on-going as part of the plan preparation. It was therefore too early to determine whether additional needs could be met over and above the existing requirement for Stoke-on-Trent.	# ± # €
		<ul> <li>SMDC is unable to assist in meeting any of SoTCC's development requirements due to development constraints, including Green Belt.</li> </ul>	
		<ul> <li>Joint assessment of gypsies, travellers and travelling showpersons accommodation</li> </ul>	
		Consultation on SHMA	
		<ul> <li>Consultation on Employment Land Review</li> </ul>	
		Consultation on SHLAA	

Organisation	Strategic matters	Oilte	Outcomes	Future arrangements
	Co-ordination of shared infrastructure	•	nto Green Infrastructure Strategy which in turn Is Policy C3 (Green Infrastructure)	Implementation and monitoring of relevant polices and Infrastructure Delivery Plan
	e.g. growth on A50	•	Agreement to jointly consider impacts of growth on the A50 and Derby/Crewe railway line and services	Further details in Statement of Common Ground (Appendix 1)
		•	Consideration of potential impacts of growth on school capacity	
	Co-ordination of Green Beltereviews	•	Input into respective green belt reviews undertaken during plan preparation	Further details in Statement of Common Ground (Appendix 1)
		•	Agreement to liaise on green belt reviews would would affect the common green belt boundary	
	Consideration of Blythe Vale Strategic Site	•	Agreement for liaison to implement Policy DSR1 (Blythe Implementation and monitoring of Vale) -mixed-use development of employment, 300 relevant polices and Infrastructure homes to the north of the site and supporting	Implementation and monitoring of relevant polices and Infrastructure Delivery Plan
				Further details in Statement of Common Ground (Appendix 1)
	Consideration of emerging strategy for the Constellation Partnership		Joint work towards emerging strategy Railocation of Blythe Vale site which may support strategy	Continued work through Constellation Partnership
				Further details in Statement of Common Ground (Appendix 1)
Newcastle-under-Lyme Borough Working towards meeting Council (NBC) development	Working towards meeting development	•	Policy SS4 (Housing and Employment Land Supply) supports growth in Moorlands Staffordshire without condemning emerging Joint Stoke and Newcastle Local	Further details in Statement of Common Ground (Appendix 1)
	requirements		Plan	

Organication	Stratogic matters	Outcomos	Firture presentemente
		housing for SMDC. NBC were unable to support this request	
		<ul> <li>SMDC is unable to assist in meeting any of NBC's development requirements due to development constraints, including Green Belt</li> </ul>	
		<ul> <li>Joint assessment of gypsies, travellers and travelling showpersons accommodation</li> </ul>	
		Consultation on SHMA	
		<ul> <li>Consultation on Employment Land Review</li> </ul>	
		Consultation on SHLAA	
	Co-ordination of shared infrastructure	<ul> <li>Input into Green Infrastructure Strategy which in turn informs Policy C3 (Green Infrastructure)</li> </ul>	Implementation and monitoring of relevant polices and Infrastructure Delivery Plan
		<ul> <li>Agreement to jointly consider impacts of growth on the A50</li> </ul>	
	Co-ordination of Green Belt reviews	te Input into respective green belt reviews undertaken during plan preparation	Further details in Statement of Common Ground (Appendix 1)
		<ul> <li>Agreement to liaise on green belt reviews would would affect the common green belt boundary</li> </ul>	
	Consideration of emerging strategy for	<ul> <li>Joint work towards emerging strategy</li> <li>Allocation of Blythe Vale site which may support strategy</li> </ul>	Continued work through Constellation Partnership

Organisation	Strategic matters	Outcomes	Future arrangements
	the Constellation Partnership		Further details in Statement of Common Ground (Appendix 1)
Stafford Borough Council	Working towards meeting development	Policy SS4 (Housing and Employment Land Supply)     supports growth in Moorlands Staffordshire without     undermining Stafford Borough	Supply) Further details in Statement of vithout Common Ground (Appendix 1)
		<ul> <li>SMDC is unable to assist in meeting any of SBC's development requirements due to development constraints, including Green Belt</li> </ul>	BC's nt
		<ul> <li>Joint assessment of gypsies, travellers and travelling showpersons accommodation</li> </ul>	avelling
		<ul> <li>Consultation on SHMA</li> </ul>	
		<ul> <li>Consultation on Employment Land Review</li> </ul>	
		<ul> <li>Consultation on SHLAA</li> </ul>	
	Co-ordination of shared infrastructure e.g. growth on A50	Input into Green Infrastructure Strategy which in turn informs Policy C3 (Green Infrastructure). SBC welcomesrelevant polices and Infrastructure the Blythe Bridge Opportunity corridor for green infrastructure, areas designated for potential new floodplain and riparian woodland within Stafford Borough Further details in Statement of Council's area should be removed from the Staffordshire Common Ground (Appendix 1) Moorlands Local Plan's Green Infrastructure Strategy maps - maps updated to reflect this	lin tum Implementation and monitoring of welcomesrelevant polices and Infrastructure on Delivery Plan New I Borough Further details in Statement of ffordshire Common Ground (Appendix 1) Strategy
		<ul> <li>Agreement to jointly consider impacts of growth on the A50</li> </ul>	th on the

Control	Strategie mottere	Chicago	Entrace of the company
	<b>1</b> O	Input into respective green belt reviews undertaken during plan preparation	Further details in Statement of Common Ground (Appendix 1)
		Agreement to liaise on green belt reviews would would affect the common green belt boundary	
	Consideration of Blythe Vale Strategic Site	• Agreement for liaison to implement Policy DSR1 (Blythe Implementation and monitoring of Vale), including infrastructure measures. SBC wish to relevant polices and Infrastructure be consulted on further detailed studies regarding new Delivery Plan infrastructure at Blythe Vale as well as a master plan for the area setting out links to adjoining areas and Common Ground(Appendix 1) landscape implications	Implementation and monitoring of relevant polices and Infrastructure Delivery Plan Further details in Statement of Common Ground(Appendix 1)
	Consideration of emerging strategy for the Constellation Partnership	Joint work towards emerging strategy      Allocation of Blythe Vale site which may support strategy	Continued work through Constellation Partnership
East Staffordshire Borough Council	Co-ordination of shared infrastructure e.g. traffic implications of Alton Towers and growth on A50	Alton Towers Resort Transport Liaison Group     co-ordinates transport improvements to mitigate traffic Legal Agreement     impacts under terms of legal agreement	Meetings to implement Alton Towers Legal Agreement Implementation and monitoring of relevant polices and Infrastructure Delivery Plan Further details in future Statement of Common Ground
	Consideration of Blythe Vale Strategic Site	Agreement to jointly consider impacts of growth on the implementation and monitoring of relevant polices and Infrastructure Delivery Plan     Further details in future Statement Common Ground	Implementation and monitoring of relevant polices and Infrastructure Delivery Plan Further details in future Statement of Common Ground

Organisation	Strategic matters	Outcomes	Future arrangements
	Initiatives to conserve and improve the Churnet Valley	<ul> <li>Churnet Valley Living Landscape Partnership co-ordinates and implements measures to conserve and improve the valley</li> </ul>	Continued joint working under provisions of the partnership
		<ul> <li>Policy SS11 (Churnet Valley Strategy) seeks to conserve and improve the valley</li> </ul>	Implementation of relevant policies
Cheshire East Council	Co-ordination of shared infrastructure	<ul> <li>Input into Green Infrastructure Strategy which in turn informs Policy C3 (Green Infrastructure)</li> </ul>	Implementation of relevant policies
	e.g. Green Infrastructure	Future consideration of cross boundary highways impacts of growth in Cheshire East and Staffordshire	potentially as part of Constellation Partnership
	Co-ordination of Green Beltereviews	<ul> <li>Input into respective green belt reviews undertaken during plan preparation</li> </ul>	Future input into new evidence
		<ul> <li>Agreement to liaise on green belt reviews would would affect the common green belt boundary</li> </ul>	
	Consideration of emerging strategy for the Constellation Partnership	<ul> <li>Joint work towards emerging strategy</li> <li>Allocation of Blythe Vale site which may support strategy</li> </ul>	Continued work through Constellation Partnership
High Peak Borough Council (HPBC)	Shared need for consideration of setting and nature conservation of Peak District National Park	Policies SS1 (Development Principles), (SD2 Low Carbon Energy), DC3 (Landscape & Settlement Setting) outline policy to address impacts on the National Park	Implementation of relevant policies Co-ordination through Strategic Alliance between HPBC and SMDC
Derbyshire Dales District Council Shared need for consideration of nature conservat District National	Shared need for consideration of setting and nature conservation of Peak District National Park	Policies SS1 (Development Principles), (SD2 Low     Carbon Energy), DC3 (Landscape & Settlement Setting)     outline policy to address impacts on the National Park Correspondence / meetings as required	Implementation of relevant policies Correspondence / meetings as required

Organication	Stratogic matters		interest or response of the
Environment Agency (EA)	Input on flood risk and environmental matters including Churnet Valley	Findings of Strategic Flood Risk Assessment and dialogue with EA has dialogue with EA has informed Local Plan Policies SD4 (Pollution and Water Quality) & SD5 (Flood Risk), H2 (Housing Allocations)  Churnet Valley Living Landscape Partnership co-ordinates and implements measures to conserve and improve the valley  Policy SS11 (Churnet Valley Strategy) seeks to conserve and improve the valley	Consultation on planning applications Implementation and monitoring of relevant policies  Consultation on future evidence base updates and Local Plan reviews  Continued joint working under provisions of the partnership
Historic England (HE)	Input on historic environment matters including Churnet Valley	Findings of Landscape, Local Green Space and Heritage Consultation on planning applications Impact Study and dialogue with HE have informed Local Plan policies including SS5 (Leek Area Strategy), DC2 Implementation and monitoring of (Historic Environment) an Strategic Development Site relevant Policies);  Churnet Valley Living Landscape Partnership co-ordinates and implements measures to conserve and updates improve the valley	Consultation on planning applications Implementation and monitoring of relevant policies  Consultation on future evidence base updates
Natural England	Input on environmental matters including Churnet Valley	<ul> <li>Policy SST1 (Churnet Valley Strategy) seeks to conserve and improve the valley</li> <li>and improve the valley</li> <li>Input into the Habitat Regulations Assessment which has informed Local Plan policies including; SS8 (Larger Villages Area Strategy), DSL1 (Land at Horsecroft Far, Implementation and monitoring of Leek) &amp; DSL2 (Land a the Mount, Leek). Natural England support conclusions and outcomes of assessment.</li> </ul>	Continued joint working under provisions of the partnership Consultation on planning applications Implementation and monitoring of relevant policies

Organisation	Strategic matters	Outcomes	Future arrangements
		Churnet Valley Living Landscape Partnership     co-ordinates and implements measures to conserve and updates     improve the valley.	Consultation on future evidence base lupdates
			and Local Plan reviews
		<ul> <li>Policy SS11 (Churnet Valley Strategy) seeks to conserve and improve the valley</li> </ul>	Continued joint working under provisions of the partnership
Homes England	Partner in the delivery of	<ul> <li>Policy H3 makes provisions for affordable housing</li> </ul>	Consultation on planning applications
	nousing, including affordable housing	<ul> <li>Policy H2 allocates land to be controlled by Homes England to enable housing development (WE003 &amp; WE053)</li> </ul>	Implementation and monitoring of relevant policies
			Continued dialogue regarding potential funding opportunities and implementation of allocation
North Staffordshire	Provision of health care	<ul> <li>Input into Infrastructure Delivery Plan</li> </ul>	Implementation and monitoring of
dinical Commissioning Groups	ir co-ordination with Local	Policy C1 (Creating Sustainable Communities) facilitatesDelivery Plan new and protects existing healthcare infrastructure	retevant polices and illitastiticule Delivery Plan
National Health Service	Provision of health care in co-ordination with Local	No direct outcome but Policy C1 (Creating Sustainable Implementation and monitoring of Communities) facilitates new and protects existing	Implementation and monitoring of relevant polices and Infrastructure
Commissioning Board	Plan	healthcare infrastructure	Delivery Plan
(NHS England)			
Office of Rail Regulation	Consideration of railway provision at Blythe Bridge	No direct outcome but Policy DSR1 (Blythe Vale)   Implementation is requires consideration of impacts on railway arising from relevant policies applications	Implementation and monitoring of relevant policies
Highways England	Consideration of impact of growth on A50	Agreement to work with Highways England and local authority partners to consider and address the impact of Local Plan growth on the A50	Joint working on study

Organisation	Strategic matters	Outcomes	Future arrangements
			Implementation and monitoring of relevant polices and Infrastructure Delivery Plan
Stoke and Staffordshire Local Enterprise	Local Plan should reflect and assist	<ul> <li>LEP's Strategic Economic Plan recognised in the LocalImplementation and monitoring of Plan's Challenges and Spatial Vision</li> </ul>	Implementation and monitoring of relevant polices
Partnership (LEP)	in delivering economic objectives	Policy SS4 (Strategic Housing and Employment Land Supply) supports housing and economic growth	
	•	<ul> <li>Policy E1 (New Employment Development) support proposals in line with LEP's priorities.</li> </ul>	
Peak District Local Nature Partnership (LNP)	Local Plan should assist in delivering LNP objectives	None direct but Policy NE1 (Biodiversity & Geological Implementation and monitoring of Resources) makes provisions to conserve and enhancerelevant polices the biodiversity of the District and neighbouring areas	Implementation and monitoring of srelevant polices
Staffordshire Local Nature Partnership (LNP)	Local Plan should assist indelivering LNP objectives	None direct but Policy NE1 (Biodiversity & Geological Implementation and monitoring of Resources) makes provisions to conserve and enhancerelevant polices the biodiversity of the District and neighbouring areas	Implementation and monitoring of relevant polices

Table 4.1 Co-operation, outcomes and future arrangements

Appendix 1 - Statements of Common Ground

### **Appendix 1 - Statements of Common Ground**

Statement of Common Ground between Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council <sup>(4)</sup>

Statement of Common Ground between Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council

This Statement of Common Ground establishes a framework for co-operation between Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council. It primarily relates to the preparation of Development Plans and also sets out a framework for future collaboration on identified strategic cross boundary planning issues. It is made within the context of the Duty to Co-operate as required under Section 110 of the Localism Act 2011.

#### 1. Purposes

- To establish areas of agreement in relation to strategic planning and development matters between the four local planning authorities
- b. To identify areas where further work is required
- To set the framework for future co-operation, including the monitoring and project management of required works

### 2. Planning Context

- 2.1 Staffordshire Moorlands District Council adopted a Core Strategy in March 2014. An early review of the Core Strategy, combined with site allocations, is now being prepared to provide the District with a single Local Plan to cover the period 2016 to 2031
- 2.2 Stafford Borough Council adopted the Plan for Stafford Borough (Part 1) in June 2014, with Part 2 adopted in January 2017, covering the period 2011 to 2031. In July 2017 the Council commenced the New Local Plan process to cover the period 2020 to 2040, with the Issues & Options stage in July 2018.
- 2.3 Stoke-on-Trent City Council and Newcastle Borough Council are in the process of preparing a Joint Local Plan to cover the period to 2033. A Preferred Options consultation document was published in February 2018.

### 3. Area

3.1 The local planning authority areas of Staffordshire Moorlands District Council, Stafford Borough Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council. For the avoidance of doubt, this excludes the parts of Staffordshire Moorlands District that lie within the Peak District National Park. Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council are in the process of preparing a Joint Local Plan. All four authorities share boundaries with one another, are located within Staffordshire and are located to the north and west of the county. Information considered in the preparation of Local Plans relating to housing, gypsies and travellers, employment and Green Belt which supports the establishment of this geographic area:

1

<sup>4</sup> Please note: as of June 2018, the Statement of Common Ground has been agreed by Staffordshire Moorlands District Council, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council.

### Strategic Housing Market Assessments (SHMA)

### Stafford Borough SHMA (2012)

- 3.2 Stafford Borough Council published a Strategic Housing Market Assessment in September 2012 as part of the evidence for the Plan for Stafford Borough 2011-2031 providing the total number of future market and affordable households based on housing and population forecasts. In conclusion the provision requirement is 500 new homes each year in Stafford Borough to fully meet the Objectively Assessed Need of which 210 affordable houses are required.
- 3.3 Between 2000 and 2011 the median house prices have increased by 151% with 87% being owner occupied / private rented and 13% social rented. Almost 75% of properties are houses, with 11% being flats, 11% bungalows and 3% others. The population of Stafford Borough will increase from 130,800 in 2011 to 146,000 by 2035, with over 65 year olds increasing by 45% and over 75 year olds by 102% during this period. In terms of household moves 62.9% took place within Stafford Borough so the area is not self-contained in terms of migration, which shows strong linkages with Stoke-on-Trent and Cannock Chase.
- 3.4 The Strategic Housing Market Assessment will be updated through the New Local Plan.

### Staffordshire Moorlands SHMA (2014) and Update (2017)

- 3.5 In terms of the definition of the Housing Market Area, the 2014 SHMA found that excluding long-distance movements, the District has a self-containment of between 60% 61%. Although the former CLG Guidance recognises that the level of self-containment in rural authorities is often lower than elsewhere, it could not be argued that Staffordshire Moorlands represents a self-contained HMA. Consideration given to the objectively assessed need for housing, including affordable housing was also given but subsequently superseded by the 2017 Update.
- 3.6 The 2017 Update was undertaken to reflect the 2014-based household projections and new employment forecasts provided by Experian and Oxford Economics. The extent of the Housing Market Area was not re-visited. The study identified an objectively assessed need for 235 to 330 homes per year to the year 2031. The bottom of the range (235) relates to the demographic needs. The top of the range (330) relates to the level of housing growth required to support the projected increase in jobs by addressing the projected decline in the working age population. A net annual need for affordable housing of 224 to 432 homes per year was also identified.

### Stoke -on-Trent and Newcastle-under-Lyme SHMA 2015 and Update 2017

3.7 Stoke-on-Trent and Newcastle-under-Lyme published an updated Strategic Housing Market Assessment in July 2017 as part of the evidence for the Joint Local Plan Strategic Options consultation. The plan period is 2013 – 2033 with the SHMA providing evidence over a longer period to 2039 and incorporating the release of the 2014-based population and household projections and Cambridge Econometrics Jobs forecasts.

2

- 3.8 In terms of the definition of the Housing Market Area, the 2015 SHMA found that Stoke-on-Trent and Newcastle-under-Lyme collectively formed a single Housing Market area based on migration and containment of moves. A high proportion of labour is also retained within the two authorities and there are similarities in house prices. However, the SHMA (Appendix 2) also highlighted the complex nature of local geographies and recognised that both authorities share a strong relationship with Stafford Borough, Cheshire East and Staffordshire Moorlands, with a notable rate of out migration from the two authorities to these authorities. In this respect the 2011 Census shows that when moves from Newcastle-under-Lyme and Stoke-on-Trent to the Staffordshire Moorlands are taken into account the level of containment within this geography is 77% (surpassing the 70% threshold in the PPG). Nevertheless, this relationship is weaker than that shared by Stoke-on-Trent and Newcastle-under-Lyme.
- 3.9 The 2017 update was undertaken to consider the findings from the ELR finalised in December 2015, particularly the forecast level of job growth and labour force availability, as well as the release of new 2014-based sub-national population and household projections in May and July 2016. The extent of the Housing Market Area was not revisited.
- 3.10 The updated analysis indicated that there is an objectively assessment need (OAN) for 1,390 dwellings per annum in the Newcastle-under-Lyme and Stoke-on-Trent housing market area (HMA), this sits within the range previously concluded in the 2015 SHMA (1,177 1,504 dwellings per annum). The total requirement over the plan period is a need for 27,800 dwellings (16,080 within Stoke-on-Trent and 11,720 within Newcastle-under-Lyme).
- 3.11 In respect of Newcastle-under-Lyme the study recommended a housing requirement of 586 per annum per year to the year 2039 to support the projected increase in employment growth. In respect of Stoke-on-Trent the study recommended a housing requirement of 804 dwellings per annum to 2039 to support the projected increase in employment growth.
- 3.12 The update also recognises an updated calculated annual need for 453 affordable homes across both Stoke and Newcastle-under-Lyme over the next five years to clear the backlog and meet newly arising need over the next five years (242 Newcastle-under-Lyme and 210 Stoke-on-Trent) with this reducing to 265 affordable homes per annum thereafter (199 Newcastle-under-Lyme and 66 Stoke-on-Trent) once the backlog is cleared.

Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015)

3.13 The assessment was jointly commissioned by the four authorities. The identified need, as at 2015, for pitches was as follows in Table 1. However the latest position is set out on Page 9 within the section 'Gypsies, Travellers and Travelling Showpeople'.

Table 1: Summary of overall pitch and plot requirements over five years and up to 2033/34

District/Local Planning Authority		Gypsy and Traveller Pitch requirements	Showperson Plot regulrements
Newcastle-	5 yr shortfall 2014/15 to 2018/19	. 1	0
under-Lyme	2019/20 to 2033/34*	7	0
Stoke-on-	5 yr shortfall 2014/15 to 2018/19	22	0
Trent	2019/20 to 2033/34*	16	0
Staffordshire	5 yr shortfall 2014/15 to 2018/19	6	0
Moorlands	2019/20 to 2033/34*	2	0
Stafford	5 yr shortfall 2012/13 to 2016/17	19	0
Borough	2017/18 to 2026/27*	24	0
Total	5 yr shortfall 2014/15 to 2018/19	48	0
Total	2019/20 to 2033/34*	48	0

Table 2: Summary of transit requirements 2014/15 to 2018/19

Authority	Five year pitch requirement (single van use)	Total maximum caravans with towing vehicles that could be accommodated
Newcastle-under-Lyme	-5	10
Stoke-on-Trent	5	10
Staffordshire Moorlands	P	
Stafford Borough		
Total	10	20

### **Employment Land Reviews**

### **Stafford Borough Employment Land Review**

- 3.14 Stafford Borough Council published an Employment Land Review in 2012 as part of the evidence for the Plan for Stafford Borough 2011-2031 which concluded that 160 hectares of employment land is required for the area at 8 hectares per year.
- 3.15 Stafford has median earnings of £26,603 per year with 68.2% of people living and working in the Borough. Of the 31.8% working outside the Borough, 8.5% work in Stoke-on-Trent whilst 19.2% work elsewhere in the West Midlands and 4.2% beyond.
- 3.16 The 2011 Census data shows that 67% of residents live and work in Stafford Borough so therefore the area is part of a broader functional market area with the strongest links being to Stoke-on-Trent.
- 3.17 The Economic Development Needs Assessment will be produced for the New Local Plan.

### Staffordshire Moorlands Employment Land Review (2014) and update (2017)

3.18 In terms of the Functional Economic Area for the District, the study concluded that it would fall within the wider economic area of Stoke-on-Trent, within which some 76% of the District's economically active residents work. The need for employment land was also considered in the report but this was subsequently updated in 2017 to take account of new data.

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3.19 The 2017 Update identified an objectively assessed need employment land of 13 to 27ha up to the year 2031. The upper end of this range corresponds with the top of the assessed need for housing to provide a consistent approach and was derived by consideration of Experian and Oxford Economics jobs forecasts. Development at the top of each range would support approximately 800 additional jobs in the District up to the year 2031.

# Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review (2015)

- 3.20 The Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review 2015 concluded that Stoke-on-Trent and Newcastle-under-Lyme together comprise a Travel to Work Area and a Functional Economic Market Area. Stoke-on-Trent remains a net importer of labour, with a net total of 6,108 in-commuters according to the 2011 Census. In contrast, Newcastle-under-Lyme is a net exporter of labour, with a net total of 8,058 out-commuters. Very strong commuting relationships exist between Stoke-on-Trent and Newcastle-under-Lyme and at the same time it acknowledged the strong commuting relationships with Stafford Borough, Staffordshire Moorlands and Cheshire East.
- 3.21 Stoke-on-Trent and Newcastle-under-Lyme's employment space is still dominated by industrial uses which account for around 70% of total employment floorspace. Whilst this is increasing in Newcastle-under-Lyme, the level of industrial stock in Stoke-on-Trent has been declining for a number of years. The 2015 study identified that for Stoke-on-Trent between 146 Ha and 201 Ha was identified as being required over the 26 year plan period to 2039. For Newcastle-under-Lyme between 44 ha and 133 ha was identified as being required to 2039. Across the FEMA overall the forecasting suggests a need for between 190 Ha and 334 Ha over the 26 year plan period.
- 3.22 Following the 2015 study a SHMA update was carried out in 2017 which linked housing and employment evidence to ascertain an Objectively Assessed Need and therefore narrow down on the range that was set out in the ELR. This identified that the OAN for employment land requirements, based on the most appropriate forecasting for the area Cambridge Econometrics was that a requirement of 199 Ha of employment land was required across the plan area to 2033 (131 Ha in Stoke-on-Trent and 68 Ha in Newcastle-under-Lyme). This amount of employment land would support in the region of 17,372 jobs (approximately 869 new jobs per annum).
- 3.23 Both Councils have been reviewing employment land monitoring information from 2013 to 2017 and the evidence from 2013 to 2017 and the evidence provided by the Joint Employment Land Review 2015 to determine how much employment land could be delivered in order to support the provision of more and better quality jobs. The total employment land supply is summarised in the table below.

	Hectares of Employment Land		
	Newcastle -under-Lyme	Stoke-on-Trent	Joint Local Plan area
New employment land developed between 2013 and 2017	4	37	41
Vacant land with planning approval for new employment development at 1 April 2017	29	87	116
Other land from the Employment Land Review (2015) which is considered to be suitable and could be allocated for employ- ment development:	30	43	73
Total Potential Employment Land Supply:	63	167	230

#### North Staffordshire Green Belt

3.24 The North Staffordshire Green Belt was approved by Staffordshire County Council in 1967, and by extension the North Staffordshire Green Belt Local Plan (June 1983) to prevent the coalescence of town and villages around the Potteries.

#### Stafford Borough

- 3.25 The adopted Plan for Stafford Borough 2011-2031 (June 2014) identifies the Green Belt boundaries for the Borough, located to the north of Stone forming part of the North Staffordshire Green Belt area and south east of Stafford as part of the West Midlands Green Belt area. As there is sufficient land to serve the development needs of Stafford Borough outside of these Green Belt areas no safeguarded land or boundary changes have been identified. However Policy E5 does identify Major Developed Sites in the Green Belt at Hadleigh Park, Moorfields Industrial Estate and the former Meaford Power Station site where employment uses are supported on previously developed areas.
- 3.26 The North Staffordshire Green Belt will be maintained through the New Local Plan in line with the national policy position and the local context.

# Staffordshire Moorlands

3.27 In Staffordshire Moorlands, the 1998 Local Plan replaced the North Staffordshire Green Belt Local Plan and made amendments to the inner boundaries of the Green Belt around Blythe Bridge, associated with the construction of the A50 which created enclosed land which could be readily parcelled for development. During the consideration of the adopted Staffordshire Moorlands Core Strategy, the planning inspector acknowledged that a comprehensive review of the Green Belt would be required in order to support housing growth Biddulph to be identified in a Site Allocations DPD. In turn, Staffordshire Moorlands Green Belt Review (2015) has identified numerous sites which may be suitable for release from the Green Belt in exceptional circumstances. The review has informed the preparation of the new Staffordshire Moorlands Local Plan with Green Belt release proposed in Biddulph, Werrington and Cheadle.

# Stoke-on-Trent and Newcastle-under-Lyme

- 3.28 A Joint Green Belt Assessment has been prepared in respect of the areas within Newcastle-under-Lyme and Stoke-on-Trent City Council designated as Green Belt. Approximately 45% of Newcastle-under-Lyme's area is designated as Green Belt. The Assessment forms part of the evidence base for the emerging Joint Local Plan.
- 3.29 The purpose of the Green Belt Assessment was to provide Stoke-on-Trent and Newcastle-under-Lyme with an objective, evidence-based assessment of how the Green Belt contributes to the five purposes of Green Belt set out in the National Planning Policy Framework (NPPF). The assessment considers the history and origins of the Stoke-on-Trent and Newcastle-under-Lyme Green Belt and how it has evolved since its inception. It provides a review of current national policy and guidance and carries out a two stage assessment:
  - Stage 1 involves dividing the whole Green Belt into General Areas and assessing them against the five purposes of the Green Belt;
  - Stage 2 involves defining smaller greenbelt parcels adjacent to the urban areas and inset settlements, and assessed as making a weak, moderate or strong contribution.
- 3.30 In total 15 General Areas were assessed as part of Stage 1 and a further 186 parcels were assessed at Stage 2. The Green Belt Assessment was published in November 2017 as evidence for the Joint Local Plan Preferred Options Consultation.
- 3.31 In Newcastle-under-Lyme the preferred options consultation document showed that additional housing and employment land is required beyond the existing supply within Newcastle-under-Lyme. This situation forms part of the exceptional circumstances evidence behind a proposal to release sites in the Green Belt within Newcastle-under-Lyme, within the vicinity of Keele University Campus and the Keele University Science and Innovation Park and sites at Kidsgrove, Talke and Chesterton.
- 3.32 In Stoke-on-Trent the Joint Local Plan Preferred Options Consultation (para. 4.3) states that it is not considered justifiable to go into the Green Belt for the delivery of development as the current requirements (in line with the SHMA 2017) can be met within the City Council's urban area. However it is considered that some very minor amendments to the boundaries within Stoke-on-Trent may be required to align the Green Belt boundary with the latest Ordnance Survey base and technological advancement in mapping. This will be set out at the Draft Joint Local Plan stage.

# 4. Strategic cross boundary matters

- 4.1 The following are agreed by the four authorities as being strategic cross boundary matters which require co-operation:
  - a. Working towards meeting development requirements
    - Housing the provision of housing across the four local planning authority areas
    - Gypsies, Travellers and Travelling Showpeople provision for accommodation
    - III. Employment the provision of employment across the four local planning authority areas
  - b. Co-ordination of shared infrastructure
    - a. Green Infrastructure
    - b. Traffic growth on A50
    - c. Education

- c. Green Belt -co-operation on the approach to Green Belt
- d. Constellation Partnership co-operation on any future joint strategy in support of the potential HS2 hub at Crewe
- e. Blythe Vale Strategic Allocation consideration of the cross boundary implications of the allocation as identified in the proposed Staffordshire Moorlands Local Plan

## 5. Agreed matters

#### Working towards meeting development requirements

#### Housing provision

- 5.1 The proposed Staffordshire Moorlands Local Plan makes provision for an average annual development of 320 dwellings up to the year 2031. This is towards the top of the range of the objectively assessed need for housing identified for the District in the 2017 SHMA Update (235 to 330dpa). This is supported by Green Belt release to enable housing growth in Biddulph and the Rural Areas. There is a shortfall of 190 homes from the top of the objectively assessed need range over the period 2012 to 2031
- 5.2 Staffordshire Moorlands District Council is unable to accommodate any potentially arising unmet housing needs from neighbouring authorities due to development constraints. In particular, the supply of land in the District is limited by Green Belt which should only be released in exceptional circumstances. Furthermore, the District also partly lies within the Peak District National Park
- 5.3 The adopted Plan for Stafford Borough makes provision for an average annual development of 500 dwellings up to the year 2031 in accordance with the objectively assessed need for housing identified for the Borough in the 2012 SHMA. Housing growth is focussed at Stafford and Stone on large-scale Strategic Development Locations as well as being delivered across a number of Key Service Villages. Since 2011 at total of 3,337 new homes have been completed with 3,509 having planning consent. Stafford Borough currently has more than a 5 year supply of housing land.
- 5.4 In February 2018 Staffordshire Moorlands District Council made a request to Stafford Borough to assist with meeting the shortfall of 190 new homes. However based on this need having to be met within the relevant Housing Market Area, the adjoining area between Stafford Borough and Staffordshire Moorlands is contained within the North Staffordshire Green Belt and therefore delivery is severely constrained in this area. At this stage no request has been received from the City of Stoke-on-Trent Council or Newcastle-under-Lyme Borough Council to accommodate any unmet housing needs within Stafford Borough, although it is noted that the Joint Local Plan currently has a shortfall of over 1,200 new homes compared to deliverable sites
- 5.5 Taking into account the Joint Local Plan evidence base Newcastle-under-Lyme Borough Council has published for consultation purposes, with Stoke-on-Trent City Council, a preferred growth strategy which seeks to provide for 11,720 homes over a twenty year plan period between 2013 and 2033 within Newcastle-under-Lyme. However, within the urban area of Newcastle-under-Lyme the Borough Council can only demonstrate delivery of 6,611 dwellings against this requirement. The Council has therefore proposed and consulted on the release land within the Green Belt to help meet its housing needs. At this stage the Council has identified sites within the

Green Belt with a capacity of 3,010 dwellings. The total delivery against the requirement is 9,621 (82% of their apportionment) leaving a shortfall of -2099. Between, 1 April 2013 and 31 March 2017, 1,080 homes have been completed in the borough.

- 5.6 Taking into account the Joint Local Plan evidence base Stoke-on-Trent City Council has a housing need requirement of 16,080 dwellings which is the city council's appointment of the joint plan area's requirement of 27,800 dwellings. The city council has published for consultation purposes, with Newcastle-under-Lyme Borough Council, a preferred options growth strategy which seeks to deliver 16,892 homes over a twenty year plan period between 2013 and 2033 within Stoke-on-Trent (105% of their appointment). How this supply is calculated is set out at paragraph 2.76 of the Preferred Options Consultation Document. Between 1 April 2013 and 31 March 2017, 2,235 homes have been completed in the city.
- 5.7 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council are both unable to assist in meeting SMDC's housing development requirements due to the fact that the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan is in the early stages of preparation.
- 5.8 The councils are still gathering evidence and have just completed a consultation on the Preferred Options which aims to meet the needs of the Joint Local Plan area. The Joint Local Plan will need to be at a more advanced stage before the councils can consider the needs of adjoining authorities as the Joint Local Plan Preferred Options consultation identifies a shortfall in housing supply within the Housing Market Area of Newcastle-under-Lyme and Stoke-on-Trent and which would need to be resolved before the consideration of housing need arising from Staffordshire Moorlands could be considered.
- 5.9 All four authorities will liaise on future consideration and evidence gathering in relation to housing requirements and provision undertaken as part of future plan making.

# Gypsies, Travellers and Travelling Showpeople

- 5.10 The Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015) identified the requirement as identified in this Statement of Common Ground.
- 5.11 There are 4 pitches in Staffordshire Moorlands. The residual requirement for pitches in the period 2014/15 to 2018/19 in the District is 3.
- 5.12 The proposed Staffordshire Moorlands Local Plan does not identify any land to accommodate the identified needs due to a lack of suitable and available land. Policy H4 of the Core Strategy and emerging Local Plan will help to deliver the shortfall in pitches through the determination of appropriate windfall sites
- 5.13 Staffordshire Moorlands District Council is unable to accommodate any potentially arising unmet needs from neighbouring authorities due to the lack of available land.

- 5.14 There are currently 69 households living on Gypsy and Traveller pitches in Stafford Borough, 12 pitches on a Local Authority site and 56 on authorised sites alongside 8 unauthorised.
- 5.15 The Plan for Stafford Borough Part 2 identifies current new provision for 43 pitches over the period 2011 to 2027 of which 36 new pitches having planning consent at St Alban's Road, Stafford. There is an unidentified need for 7 pitches which will be delivered through windfall sites over the Plan period in line with Policy C7 of the adopted Plan for Stafford Borough.
- The Stafford Borough New Local Plan will allocate a new gypsy site to meet requirements through to 2040 but will be unable to accommodate any potentially arising unmet needs from neighbouring authorities due to the lack of available land despite having a request from Staffordshire Moorlands District Council to do so in February 2018. Stafford Borough will need to update the Gypsy and Traveller and Travelling Showperson Accommodation Assessment through the New Local Plan either jointly with neighbouring authorities or independently.
- 5.17 The Joint Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015) identifies a shortfall of one pitch between 2014 and 2019 for Newcastle-under-Lyme. A further six pitches are required between 2019 and 2034, bringing the total requirement to seven permanent pitches. In addition to the provision of permanent pitches, the study identifies the requirement to plan for five transit pitches across Newcastle-under-Lyme between 2015/16 and 2018/19.
- 5.18 Within Stoke-on-Trent the Joint Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015) identifies a shortfall of 22 pitches between 2014 and 2019 and a further requirement for 16 pitches between 2019 and 2034, bringing the total requirement to 38 permanent pitches. In addition to the provision of permanent pitches, the study identifies the requirement to plan for five transit pitches across Stoke-on-Trent between 2015/16 and 2018/19.
- 5.19 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council have cooperated on the preparation of a Joint methodology to identify the provision of pitches. Preparations are underway to consult on the Joint methodology and potential land to accommodate the requirement later in 2018. Therefore, at this stage the borough council is not in a position to identify suitable and/or available land within Newcastle-under-Lyme to accommodate its needs, or the needs of other local authorities. However, the shortfall of housing and employment land within Newcastle-under-Lyme means that the borough council is unable to accommodate any potentially arising unmet gypsy and traveller needs from neighbouring authorities due to a lack of available land.

# **Employment provision**

- 5.20 The proposed Staffordshire Moorlands Local Plan makes provision for 27ha of employment land up to the year 2031. This is the top end of the objectively assessed need for employment land for the District and supports the growth of approximately 800 jobs within the District.
- 5.21 Staffordshire Moorlands District Council is unable to accommodate any potentially arising unmet employment needs from neighbouring authorities due to development

- constraints. In particular, the supply of land in the District is limited by Green Belt which should only be released in exceptional circumstances. Furthermore, the District also partly lies within the Peak District National Park
- 5.22 Stafford Borough Council published an Employment Land Review in 2012 as part of the evidence for the Plan for Stafford Borough 2011-2031 which concluded that 160 hectares of employment land is required for the area at 8 hectares per year.
- 5.23 The Plan allocates a total of 89 hectares of new employment land on strategic development areas at Stafford, Stone, Ladfordfields and Raleigh Hall. Currently 23.2 hectares have been completed since 2011 and 70 hectares (gross) have planning commitments, with 50.4 hectares allocated. At this stage no request has been received from neighbouring authorities to accommodate any unmet employment needs within Stafford Borough.
- 5.24 Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council agreed a Joint Employment Land Review in December 2015 to inform the preparation of a new Joint Local Plan. The ELR together with the SHMA, recommends that the OAN for employment land should be set to meet the Cambridge Econometrics LEFM, amounting to 199 hectares of land to be delivered for B-Class uses over the plan period 2013 to 2033. This OAN is made up of 68 hectares for Newcastle-under-Lyme and 131 hectares for Stoke-on-Trent.
- 5.25 However the availability of land for employment development in the plan area has led the councils to identify a preferred employment land supply of 230 hectares, which is approximately 15% higher than the OAN. Both councils propose to maintain this high level of supply across the plan area so as to help deliver wider economic aspirations and give flexibility and choice for the market.

Within Newcastle-under-Lyme this supply is made up of the following:

- 4 hectares of completed employment land between 2013 and 2017
- 28 hectares of vacant land with planning approval
- 18 hectares of vacant employment land that is currently considered to be suitable and available.
- 5.26 Within Newcastle-under-Lyme there is currently an identified shortfall of 18 hectares of employment land. However in support of the delivery of an innovation led, higher value employment growth, as advocated by the Stoke-on-Trent and Staffordshire LEP, the Joint Local Plan Preferred Options Consultation Document has proposed the development of 12.5 ha of B1a/B1b land within the Green Belt adjacent to the existing Keele Science and Innovation Park. This leaves a shortfall of 5.5 hectares against the identified need of 68 Hectares. However, as indicated above this shortfall can be met across the Functional Economic Market Area.
- 5.27 The new jobs that are projected to be created under the OAN total 17,372 jobs. Of this total job growth figure, 7,613 are projected to be in Newcastle-under-Lyme and 9,759 in Stoke-on-Trent. Within Stoke-on-Trent the Joint Local Plan Preferred Options Consultation Document (para. 2.32 2.35) identifies a supply of 167 hectares of employment land (against a requirement of 131 hectares) within Stoke-on-Trent, the supply is made up of the following:
  - 37 hectares of completed employment land between 2013 and 2017
  - 87 hectares of vacant land with planning approval
  - 43 hectares of vacant employment land that is currently considered to be suitable and available.

5.28 In Stoke-on-Trent 89% of the employment land supply comprises of previously developed land and the preferred sites are all identified within the urban area of Stoke-on-Trent and are concentrated close to the City and Town centres and around major transport corridors (that is the A50 and A500 and the Manchester-Stafford and Crewe-Derby railway lines). The Ceramic Valley Enterprise Zone covers a large proportion of this employment land supply, from Cliffe Vale and Etruria Valley in the centre of the conurbation to Chatterley Valley and Tunstall in the north. The updated monitoring evidence identifies that Stoke-on-Trent is experiencing a marked improvement in the take-up of employment land in recent years and this is now at a level that is comparable to longer-term trends. All four authorities will liaise on future consideration and evidence gathering in relation to employment requirements and provision undertaken as part of future plan making.

# Co-ordination of shared infrastructure

- 5.29 Signatories to this statement will co-ordinate green infrastructure strategies and any subsequent delivery plans to ensure a consistent and complementary approach
- 5.30 Highways England has identified the need to consider the cumulative impact of development at Blythe Vale along with growth identified in the Joint Stoke-on-Trent and Newcastle Borough Local Plan and East Staffordshire Local Plan on the A50 with a detailed assessment of the impact of the A50/A521 junction a priority.
- 5.31 Staffordshire Moorlands District Council will work with partners, including the signatories to this Statement of Common Ground and others such as Staffordshire County Council, East Staffordshire Borough Council, Highways England, landowners and developers to implement the requirements of Policy DSR1 to ensure that cross boundary strategic planning matters are addressed. This will include consideration of the transport implications for the A50, associated improvements as required by Highways England and the Derby-Crewe railway line and services.
- 5.32 There are cross boundary movements of pupils between the respective authority areas. The signatories to this statement will liaise with one another and Staffordshire County Council to address matters that may arise in terms of accommodating growth and the subsequent demand for school places.

# Green Belt

- 5.33 The adopted and proposed Green Belt boundaries in Staffordshire Moorlands prevent urban sprawl and the merging of towns and villages along the border of the Local Plan areas.
- 5.34 The North Staffordshire Green Belt boundary was originally defined in 1967 and its function defined in The North Staffordshire Green Belt Local Plan adopted in 1983 (Summary of Survey and Issues Section, para 1.02) as directing the continuing pressure for development in rural areas to the regeneration of the older parts of the urban areas and maintaining the valuable tracts of open countryside near the built up area.

- 5.35 At paragraph 2.03, it sets out the established aims of the Green Belt in North Staffordshire, as originally approved by the County Council in 1967. This is as follows:
  - a) "To limit the expansion into adjoining open country of the urban areas of North Staffordshire forming part of the Potteries Conurbation.
  - b) To prevent the following towns and settlements in the adjoining open area from merging with the Potteries Conurbation and with other settlements;
  - a) The built up areas of Kidsgrove (within Newcastle-under-Lyme) and Biddulph;
  - b) The settlements of:

Brown Edge, Endon, Stanley, Bagnall, Stanley Moor, Norton Green, Baddeley Green, Baddeley Edge, Light Oaks, Werrington, Cellarhead, Caverswall, Cookshill, Blythe Bridge, Forsbrook, Meir Heath, Barlaston (within Stoke-on-Trent)

Alsagers Bank, Halmer End,

Miles Green, Wood Lane, Bignall End and Audley. (within Newcastle-under-Lyme)

c) To prevent the coalescence of the following towns and settlements around the Potteries Conurbation:

Madeley Heath with Madeley; Betley with Audley. (within Newcastle-under-Lyme)

Leek with Longsdon; Leek with Cheddleton; Longsdon with Cheddleton; Longsdon with Endon; Cheddleton with Folly Lane; Folly Lane with Wetley Rocks; Wetley Rocks with Cellarhead; Cheadle with Kingsley Holt; Kingsley with Kingsley Holt; Cheadle with Dihorne; Cheadle with Forsbrook; Fulford with Meir Heath; Stone with Oulton; Stone with Yarfield; Tittensor with Barlaston; Barlaston with Stone;

5.36 The adopted Plan for Stafford Borough 2011-2031 (June 2014) identifies the Green Belt boundaries for the Borough, located to the north of Stone forming part of the North Staffordshire Green Belt area and south east of Stafford as part of the West Midlands Green Belt area. As there is sufficient land to serve the development needs of Stafford Borough outside of these Green Belt areas no safeguarded land or boundary changes have been identified. However Policy E5 does identify Major Developed Sites in the Green Belt at Hadleigh Park, Moorfields Industrial Estate and

the former Meaford Power Station site where employment uses are supported on previously developed areas. The North Staffordshire Green Belt will be maintained through the New Local Plan in line with the national policy position and the local context.

5.37 The authorities will liaise on any future Green Belt reviews that would affect shared the Green Belt boundaries in order to consider the merits of a consistent approach.

## Constellation Partnership

- 5.38 All signatories to this statement form part of the Constellation Partnership which is in the process of developing a growth strategy to maximise the economic benefits of the potential HS2 hub at Crewe across Cheshire and Staffordshire.
- 5.39 Joint working between the signatories of this statement and the wider partnership are set out in the terms of the Constellation Partnership Concordat.
- 5.40 Emerging or future Local Plans will have regards to the Constellation Partnership's Growth Strategy.

# Blythe Vale Strategic Allocation

- 5.41 The Staffordshire Moorlands Local Plan includes a 48.5ha mixed-use allocation for approximately 300 dwellings, employment and supporting infrastructure at Blythe Vale. The site lies adjacent to the A50 and is in close proximity to the boundary with Stoke-on-Trent and Stafford Borough.<sup>1</sup>
- 5.42 Policy DSR1 (Blythe Vale) of the Staffordshire Moorlands Local Plan includes a requirement for the preparation of a comprehensive master plan for the site, the provision of a Transport Assessment, Travel Plan, flood risk assessment, landscaping scheme, ecological survey and management plan, measures to improve sustainable transport routes and connectivity with Blythe Bridge and contributions towards open space, education and other community needs as required.
- 5.43 Stafford Borough Council notes the significant mixed use development at Blythe Vale including 300 new homes and over 48 hectares of employment land, which is supported through the Constellation Partnership provided this notes new development at Hadleigh Park, a Major Developed Site in the Green Belt of Stafford Borough. However the Borough Council wish to be consulted on further detailed studies regarding new infrastructure at Blythe Vale as well as a master plan for the area setting out links to adjoining areas and landscape implications. Whilst the Borough Council welcomes the Blythe Bridge Opportunity corridor for green infrastructure, areas designated for potential new floodplain and riparian woodland within Stafford Borough Council's area should be removed from the Staffordshire Moorlands Local Plan's Green Infrastructure Strategy maps

<sup>&</sup>lt;sup>1</sup> On 2nd November 2017, full planning consent was granted by Staffordshire Moorlands District Council on part of the allocation for 118 dwellings, access, pedestrian and cycle linkages, open space, landscaping and sustainable urban drainage measures.

- 5.44 The Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review 2015 identified the Blythe Bridge strategic site as playing an important role in meeting the investment needs of the Stoke and Newcastle conurbation in the early 1990s.
- 5.45 Newcastle-under-Lyme Borough Council considers that the proposed employment land allocation at Blythe Vale (southern part of the 'site) should be protected from being developed for housing and promoted for B2/B8 uses.
- 5.46 Stoke-on-Trent City Council considers the Blythe Vale site to be an important strategic employment site on the boundary of Stoke-on-Trent, as recognised within the Newcastle-under-Lyme and Stoke-on-Trent Joint Employment Land Review 2015. The allocation of the Blythe Vale site is supported, particularly for employment generating uses and in particular the southern part of the site should be protected for employment uses (B2/B8).
- 5.47 Policy DSR1 (Blythe Vale) of the Staffordshire Moorland Local Plan Submission Version) states that the "residential development should be located to the north of the site". The development will be subject to a comprehensive masterplan for the whole site, including the delivery of employment land to the south of the A50
- 5.48 Staffordshire Moorlands District Council proposes to introduce a more flexible approach to the site by opening the potential range of employment to all B-use class developments, including B8. This departure from the former approach to the Regional Investment Site is proposed in order to facilitate the delivery of the site which to date has been restricted to B1 and B2 (where appropriate) without success.
- 5.49 Staffordshire Moorlands District Council will work with partners, including the signatories to this Statement of Common Ground to implement the requirements of Policy DSR1 to ensure that cross boundary strategic planning matters are addressed.

# 6 Decision-making & project management

- 6.1 An officer working group with representatives from each authority shall liaise quarterly to determine and agree the scope for further engagement on strategic planning matters. This will include consideration of the need to involve wider stakeholders, including those named in this Statement of Common Ground.
- 6.2 Details of activities undertaken in relation to this Statement of Common Ground shall be recorded and published in a monitoring report in accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 6.3 This Statement of Common Ground shall be reviewed in whole or in part as required and as a minimum at the time of a relevant Development Plan update or Development Plan review. Any such review will require Member approval from each respective authority.

# 7 <u>Limitations</u>

7.1 For the avoidance of doubt, this Statement of Common Ground shall not fetter the discretion of the local authorities in the determination of any planning application, or in the exercise of any of its statutory powers and duties, or in its response to

consultations, and is not intended to be legally binding. The terms of the Statement of Common Ground can be dissolved at the written request of either party.

Signed

Staffordshire Moorlands District Council

Stafford Borough Council

Date

4-6-2018

Stoke-on-Trent City Council

A. Munday

PORTFOLIO HOLDER

25 6.2018

Newcastle-under-Lyme Borough Council

FORTHOUS HODER FOR PLANNING + GROWTH.

# Statement of Common Ground between Staffordshire Moorlands District Council and the Peak District National Park Authority.

Statement of Common Ground between Staffordshire Moorlands District Council and the Peak District National Park Authority

This Statement of Common Ground establishes a framework for co-operation between Staffordshire Moorlands District Council and the Peak District National Park Authority. It primarily relates to the preparation of Development Plans and also sets out a framework for future collaboration on identified strategic cross boundary planning issues. It is made within the context of the Duty to Co-operate as required under Section 110 of the Localism Act 2011.

#### 1. Purposes

- To establish areas of agreement in relation to strategic planning and development
   matters between the two local planning authorities
- b. To identify areas where further work is required
- c. To set the framework for future co-operation, including the monitoring and project management of required works

# 2. Planning Context

Staffordshire Moorlands District Council adopted a Core Strategy in March 2014. An early review of the Core Strategy, combined with site allocations, is now being prepared to provide the District with a single Local Plan to cover the period 2016 to 2031.

The Peak District National Park Authority adopted a Core Strategy in October 2011. A Development Management Polices Development Plan Document was submitted to the Secretary of State in February 2018.

# 3. Area

This Statement of Common Ground relates to the local planning authority areas of Staffordshire Moorlands District Council and the Peak District National Park Authority

The north and east of the Staffordshire Moorlands lies within the National Park. As such, the two authorities function as the two local planning authorities covering the district as a whole. The National Park Authority also functions as the local planning authority for districts and boroughs which adjoin Staffordshire Moorlands including; High Peak, Derbyshire Dales and Cheshire East.

The Staffordshire Moorlands Strategic Housing Market Assessment (2014) and a subsequent partial update in 2017 were undertaken on the basis of population, household and jobs projections that relate to the whole of the District, including the parts of the national park that fall within the District boundary.

In terms of the definition of the Housing Market Area, the 2014 SHMA found that excluding long-distance movements, the District has a self-containment of between 60% – 61%. Although the former CLG Guidance recognises that the level of self-containment in rural authorities is often lower than elsewhere, it could not be argued that Staffordshire Moorlands represents a self-contained HMA. Consideration given to the objectively assessed need for housing, including affordable housing was also given but subsequently superseded by the 2017 Update.

The 2017 Update was undertaken to reflect the 2014-based household projections and new employment forecasts provided by Experian and Oxford Economics. The extent of the Housing Market Area was not re-visited. The study identified an objectively assessed need for 235 to 330 homes per year to the year 2031. The bottom of the range (235) relates to the demographic needs. The top of the range (330) relates to the level of housing growth required to support the projected increase in jobs by addressing the projected decline in the working age population. A net annual need for affordable housing of 224 to 432 homes per year was also identified.

These identified needs relate to the District as a whole.

The Staffordshire Moorlands Employment Land Review (2014) and update (2017) provide evidence in relation to land requirements and the functional economic area.

In terms of the Functional Economic Area for the District, the study concluded that it would fall within the wider economic area of Stoke-on-Trent, within which some 76% of the District's economically active residents work. The need for employment land was also considered in the report but this was subsequently updated in 2017 to take account of new data.

The 2017 Update identified an objectively assessed need employment land of 13 to 27ha up to the year 2031. The upper end of this range corresponds with the top of the assessed need for housing to provide a consistent approach and was derived by consideration of Experian and Oxford Economics jobs forecasts. Development at the top of each range would support approximately 800 additional jobs in the District up to the year 2031.

As with the Strategic Housing Market Assessment, the employment land requirement relates to the whole of the District, including the relevant part of the Peak District National Park.

# 4. Strategic cross boundary matters

The following are agreed by the two authorities as being strategic cross boundary matters which require co-operation:

- a. Working towards meeting development requirements
  - Housing the provision of housing across the two local planning authority areas
  - Employment the provision of employment across the two local planning authority areas
- b. Co-ordination of shared infrastructure
  - a. Green Infrastructure
- c. The need to recognise the statutory purposes of the Peak District National Park as well as the need to protect its setting.
- d. Support for neighbourhood plans which span the boundary of the two authorities

# 5. Agreed matters

# Working towards meeting development requirements

## Housing provision

- The proposed Staffordshire Moorlands Local Plan makes provision for an average annual development of 320 dwellings up to the year 2031. This is towards the top of the range of the objectively assessed need for housing identified for the District in the 2017 SHMA Update (235 to 330dpa). This is supported by Green Belt release to enable housing growth in Biddulph and the Rural Areas. There is a shortfall of 190 homes from the top of the objectively assessed need range over the period 2012 to 2031.
- Staffordshire Moorlands District Council is unable to accommodate any potentially arising unmet housing needs from neighbouring authorities due to development constraints. In particular, the supply of land in the District is limited by Green Belt which should only be released in exceptional circumstances. Furthermore, the District also partly lies within the Peak District National Park. It is recognised however that directing growth to urban areas beyond the National Park boundary also demonstrates the regard shown by the District Council to achieving the statutory purposes of the National by reducing pressure on the protected landscape
- The Staffordshire Moorlands Local Plan makes an allowance for the completion of 100 dwellings within the District but inside the Peak District National Park up to the year 2031. This is based on past trends for development. It does not relate to a development requirement for the Peak District National Park Authority, but reflects the exceptional approach to development that helps further the purposes and duty on the National Park to have regard to social and economic well-being of its
- District Council housing officers will continue to reflect National Park purposes, policies and legal mechanisms when discharging their statutory housing functions in the National Park area e.g. through the allocation of completed affordable homes to people who meet the terms of signed S106 agreements. This is to ensure that homes remain affordable and available to local people in housing need in perpetuity, which reduces the pressure for future development. Close liaison with both the National Park Authority and rural parishes can ensure the future sustainability of schemes by addressing the needs of National Park communities in perpetuity.
- Data relating to housing completions and commitments across the whole of Staffordshire Moorlands will be monitored and shared between the two authorities on an annual basis to ensure that the 100 dwelling contribution remains an accurate estimate of provision.
- Staffordshire Moorlands District Council will continue to work with other relevant local
  planning authorities to identify the scope for them to accommodate some of the
  unmet housing need for the District.

 The Peak District National Park Authority and Staffordshire Moorlands District Council will continue to liaise and consult on future evidence gathering and development plan updates in relation to housing matters. This includes the ongoing Joint Strategic Housing and Economic Land Availability Assessment (SHELAA).

#### Employment provision

- The proposed Staffordshire Moorlands Local Plan makes provision for 27ha of employment land up to the year 2031. This is the top end of the objectively assessed need for employment land for the District and supports the growth of approximately 800 jobs within the District.
- Staffordshire Moorlands District Council is unable to accommodate any potentially
  arising unmet employment needs from neighbouring authorities due to development
  constraints. In particular, the supply of land in the District is limited by Green Belt
  which should only be released in exceptional circumstances. Furthermore, the
  District also partly lies within the Peak District National Park
- Paragraph 14 and footnote 9 of the NPPF state that objectively assessed needs (OAN) should be met unless specific policies in the Framework indicate development should be restricted. Paragraph 115 makes it clear that great weight should be given to conserving landscape and scenic beauty in National Parks and that the conservation of cultural heritage is an important consideration and should be given great weight. The footnote 25 to this paragraph refers to the English National Parks and the Broads UK Government Vision and Circular 2010. This Circular outlines Government's expectations for housing provision in National Parks. It states that the National Parks are not suitable locations for unrestricted housing and that general housing targets are inappropriate. It goes on to state that new housing should be focussed on meeting affordable housing requirements and supporting local employment opportunities and key services.
- The Authority therefore restricts development to levels below that which would otherwise be acceptable were the area not a protected landscape. Paragraph 47 is read alongside paragraph 14, footnote 9 and paragraph 115 and footnote 25 since these last two paragraphs are included specifically to cover the expectations for delivery in National Parks. They create the flexibility within the National Framework to enable NPAs to achieve their statutory purposes. The Authority considers that these are specific policies that mean it is not justified to require the Authority to meet OAN in the way envisaged by NPPF paragraph 47.
- Nevertheless the Authority understand the OAN of its planning area and works with constituent authorities on evidence work such as SHELAA to find ways to address housing need in accordance with national park purposes and duty and without imposing a housing target or site allocations.

 Both authorities will liaise on future consideration and evidence gathering in relation to employment requirements and provision undertaken as part of future plan making. This includes the ongoing SHELAA.

# Co-ordination of shared infrastructure

- Signatories to this statement will co-ordinate green infrastructure strategies and any subsequent delivery plans to ensure a consistent and complementary approach
- The Peak District National Park Authority and Staffordshire Moorlands District Council will liaise on future infrastructure planning to identify opportunities
- In the event that Staffordshire Moorlands District Council decides to implement a
  Community Infrastructure Levy, the scope to include Green Infrastructure shared with
  the National Park Authority on its Regulation 123. "Infrastructure List" would be
  considered and prioritised accordingly alongside other measures required to support
  growth

The need to protect the setting of the Peak District National Park and recognition of the Park's statutory purposes

- Staffordshire Moorlands District Council recognises its duty to have regard to the purposes of the National Park as specified in the Environment Act 1995, namely;
  - (ii) to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and
  - (ii) to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.
- The spatial strategy and policies of the Staffordshire Moorlands Local Plan support the purposes of the National Park;
- In particular, the policies contained in the Staffordshire Moorlands Local Plan provide an appropriate degree of protection to the setting of the National Park. The policies and the sites to which they relate have been informed by the Landscape, Local Green Space and Heritage Impact Study. This assessment considered the impact of development sites and recommended appropriate mitigation measures and policy responses to be included in the Staffordshire Moorlands Local Plan
- Staffordshire Moorlands District Council will apply the policies of the Local Plan that
  relate to the protection of the setting of the National Park during the determination of
  planning applications. These include Policies SS1 (Development Principles), SS10
  (Other Rural Areas Strategy) and DC3 (Landscape and Settlement Setting)

- Staffordshire Moorlands District Council will continue to consult with the National Park Authority on planning applications which adjoin or are in close proximity to the National Park boundary. Consultation on planning applications which are located away from the National Park boundary but which may have a significant impact on the National Park will also be undertaken. Engagement at the pre-application stage will also be undertaken where appropriate.
- The National Park Authority and Staffordshire Moorlands District Council will continue to consult and liaise on the progress being made on development sites close to the National Park boundary or which are located away from the National Park boundary but which may have a significant impact on the National Park in terms of the agreed policy positions regarding design and landscaping treatments to respect the urban/rural transition and the overall character and appearance of development and its impact on the setting of the National Park.

## Support for neighbourhood plans which spans the boundary of the two authorities

- The Peak District National Park Authority and Staffordshire Moorlands District Council support the preparation of Neighbourhood Plans that accord with the strategic policies of the Peak District National Park Core Strategy and Staffordshire Moorlands Local Plan where applicable;
- Neighbourhood Planning support for Town / Parish Councils and Neighbourhood Forums will be provided by both the Peak District National Park Authority and Staffordshire Moorlands District Council when a defined Neighbourhood Area spans the plan areas of each respective Local Planning Authority;
- Where formal decisions are required by a local planning authority in relation to the stages of neighbourhood planning as set out in the Neighbourhood Planning Regulations, the decisions will be taken by both Staffordshire Moorlands District Council and the Peak District National Park Authority. The authorities will liaise over both committee timetabling and the content and recommendations of committee reports. Decision statements will be issued jointly and publicised by both authorities.
- Publicising neighbourhood areas and draft neighbourhood plans for public consultation will be carried out jointly by both authorities, over the same time-frame.
- The appointment of an independent Examiner will be made following agreement between both authorities and the Town or Parish Council / Neighbourhood Forum.
- Department for Communities and Local Government Neighbourhood Planning Grant
  will be claimed by Staffordshire Moorlands District Council. Following receipt of each
  quarter's grant, Peak District National Park will invoice for a share reflective of the
  distribution of population across the Peak District National Park and Staffordshire
  Moorlands Local Plan areas within the neighbourhood area in question.
- Costs of examination and referendum for a cross boundary Neighbourhood Plan will be shared according to the same division of Neighbourhood Planning Grant

# 6. Decision-making & project management

- An officer working group with representatives from each authority shall liaise quarterly to determine and agree the scope for further engagement on strategic planning matters. This will include consideration of the need to involve wider stakeholders, including those named in this Statement of Common Ground.
- Details of activities undertaken in relation to this Statement of Common Ground shall be recorded and published in a monitoring report in accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012.
- This Statement of Common Ground shall be reviewed in whole or in part as required and as a minimum at the time of a relevant Development Plan update or Development Plan review. Any such review will require Member approval from each respective authority.

# 7. Limitations

For the avoidance of doubt, this Statement of Common Ground shall not fetter the discretion of the local authorities in the determination of any planning application, or in the exercise of any of its statutory powers and duties, or in its response to consultations, and is not intended to be legally binding. The terms of the Statement of Common Ground can be dissolved at the written request of either party.

Signed

Date

Staffordshire Moorlands District Council

S. E. Kapphs

5-6-2018

Peak District National Park Authority

12 h June 2018.

Picture V.1

June 2018

Appendix 2 - Minutes of meetings

June 2018

# **Appendix 2 - Minutes of meetings**

Note of Planning Policy meeting between Staffordshire Moorlands District Council and the Peak District National Park Authority

Date: 7 January 2016

Venue: Aldern House, Bakewell

Present: Ruth Wooddisse (SMDC) Brian Taylor (PDNPA)
Mark James (SMDC) Ian Fullilove (PDNPA)

1. Local Plan / LDF update

# a. SMDC Options Consultation and forthcoming Preferred Options

MJ and RW provided an update on the content and feedback from the Options Consultation held during the Summer of 2015. The consultation considered site options and wider policy matters and generated 5500 responses. Comments were being analysed to inform the preparation of the Preferred Options Local Plan which was due for public consultation in April 2016.

# b. SMDC evidence base update

MJ referred to the recently commissioned update to the assessment of the objectively assessed need for housing which was due to report back in late January. An assessment of plan and site viability had also been commissioned recently. It is also proposed to commission a heritage and landscape study to consider the impact and potential mitigation measures for the Preferred Options sites.

## c. PDNPA plan and evidence update

BT and IF explained that a Development Management Policies DPD was due for consultation in April 2016. The plan would relate to the adopted Core Strategy. A new Policies Map would also be prepared. In addition, a series of "Area Action" style plans are scheduled for Recreational Hubs within the National Park to set the framework for future improvements. Am Issues and Options consultation on these plans would take place in 2016.

## 2. Discussion of potential areas of cooperation

# a. Housing development within the National Park

A discussion was held around the scope for the new Staffordshire Moorlands Local Plan to make an allowance for potential housing completions within the parts of the district that lies within the National Park. This approach has previously been taken forward in High Peak and Derbyshire Dales. Furthermore, it was confirmed by MJ that the objectively assessed need for housing figure for Staffordshire Moorlands relates to the whole district.

BT set out two possible options for calculating the potential number of relevant completions in the National Park. 1. – a trend based approach looking at past completions, or 2. – a review of potential sites that may come forward. Given the relatively small size of sites expected to come forward in Staffordshire Moorlands and the associated potential for windfall sites, it was agreed that a trend based approach was appropriate.

ACTION – PDNPA to advise SMDC on an appropriate trend based housing completions figure for the plan period (2011 to 2031). Ideally, this information would be available before SMDC agrees its Preferred Option housing requirement in early February.

# b. Policies to consider the setting of the National Park

RW began the discussion by talking through the potential housing allocations and infill boundary proposals in the vicinity of the National Park as identified in the recent Options Consultation. These included proposals at Blackshaw Moor, Meerbrook, Bradnop, Winkhill and Waterhouses.

BT and IF did not identify any significant concerns with the options. However, BT stated that development should look to soften the edge of settlements through sensitive layouts and design where appropriate.

MJ stated that the policies of the new Local Plan would seek to ensure landscape matters, including the settling of the National Park. They could take the form of a generic design policy and site specific policies where appropriate.

ACTION - MJ to share relevant draft policies with the PDNPA for comments

# c. Evidence base studies

It was agreed that it would be helpful if the PDNPA had the opportunity to review the forthcoming landscape and heritage assessment of the Preferred Option Local Plan. The study was expected to commence after the publication of the Preferred Options in April 2016.

ACTION – MJ to invite PDNPA to comment on study as details emerge.

# d. Management of neighbourhood planning

It was agreed by all parties that a consistent approach to supporting Neighbourhood Planning in Parishes that span the two Local Plan areas. The approach could reflect that already agreed between High Peak and the National Park Authority.

# 3. Duty to Cooperate Statement / Memorandum of Understanding

An MoU between SMDC and the National Park Authority was proposed by SMDC to cover the issues identified above where continued cooperation was appropriate.

The principle of the MoU was agreed by the National Park Authority who also suggested that this could potentially relate to the Strategic Alliance and therefore also include the existing MoU with High Peak Borough Council.

ACTION - MJ look into the suitability of a MoU for the three authorities and to circulate a draft MoU for consideration by the National Park Authority in due course.

# 4. AOB

BT suggested that he would welcome the opportunity to discuss housing enabling work with the relevant contact at SMDC. A discussion was held around housing enabling work in Meerbrook and on whether the Housing Needs Survey had been refreshed.

ACTION – MJ to let BT know who the relevant contact is following the Strategic Alliance Service Review.

 $\operatorname{ACTION}$  – MJ to let BT know if an update to the Housing Needs Survey in Meerbrook was undertaken.

Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council, Newcastle Borough Council and Stafford Borough Council

Date: 10 August 2017

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Alex Yendole (SBC)

Helen Beech (NBC) Joanne Mayne (SoTCC)

# 1. Local Plans Update

MJ confirmed that the SMDC Preferred Options consultation had commenced with a closing date of 22<sup>nd</sup> September.

JM and HB referred to the SoTCC and NBC Strategic Options consultation for the Joint Local Plan was also underway with an extended deadline of 22<sup>nd</sup> August. The options relate to the overall level and distribution of housing and employment growth across the two areas. MJ and AY would formally respond by the deadline.

MJ raised concerns about recent letter sent by Steve Quartermain to Chief Planning Officers. The letter included reference to a new deadline of 31 March 2018 for LPAs to submit their Local Plans using the current guidance for the OAHN methodology. After this date, submitted plans should normally have applied the new standard methodology which was due for consultation from September.

AY questioned how the standard OAN would apply when neighbouring LPAs cannot agree the OAHN for the HMA. This may prove difficult where LPAs are not fully self contained HMAs and share housing markets with their neighbours. This led to a discussion around how housing requirements may best be shared between neighbours if this was found to be necessary. It was concluded that it would be important that the location of any shared housing in a neighbouring plan area was of relevance to the identified requirement. This was critical when only some areas of neighbouring LPAs shared housing market relationships.

# 2. Gypsies and Travelers

MJ confirmed that the Local Plan Preferred Options document does not identify a site to accommodate the needs identified in the GTAA. A willing land owner had not been identified and therefore the plan was now reliant upon a criteria based policy to help meet the need through future windfall. The group discussed the possible implications and associated actions.

# 3. Constellation Partnership

AY referred to the recent draft evidence report prepared on behalf of the Constellation Partnership. Views were sought by the Partnership on the evidence which it was understood was intended to develop a strategy for the period up to the year 2050.

# 4. Date of next meeting

It was agreed that a date in October would be arranged.

# 5. AOB

MJ highlighted that St Modwen had submitted a planning application for housing on the Blythe Vale Regional Investment Site. JM and AY requested that their respective LPAs were consulted. ACTION – MJ to raise this with Planning Applications Manager.

June 2018

Note of Planning Policy meeting between Staffordshire Moorlands District Council (SMDC) and Stafford Borough Council (SBC)

**Date:** 14 January 2016 **Venue:** Moorlands House, Leek

Present: Ruth Wooddisse (SMDC)

Mark James (SMDC) Alex Yendole (SBC)

# 1. Local Plan update

# a. SMDC Options Consultation and forthcoming Preferred Options

MJ provided an update on the content and feedback from the Options Consultation held during the Summer of 2015. The consultation considered site options and wider policy matters, and generated 5500 responses. Comments were being analysed to inform the preparation of the Preferred Options Local Plan which is due for public consultation in April 2016.

# b. SMDC evidence base update

MJ referred to the recently commissioned update to the assessment of the objectively assessed need for housing, which was due to report back in late January. Latest update in July 2015 indicated a range of between 220-460 dwellings per annum (dpa). An assessment of plan and site viability had also been commissioned recently. It is also proposed to commission a heritage and landscape study to consider the impact and potential mitigation measures for the Preferred Options sites.

# c. Plan for Stafford Borough and evidence update

AY explained that SBC adopted the Plan for Stafford Borough in June 2014 and are currently working on Part 2 of the new Plan, which identifies Settlement and Industrial Estate boundaries. The Publication stage on Part 2 of the new Plan ends on the 25<sup>th</sup> January 2016. AY anticipated that SBC will submit in April 2016 and an examination could take place later in the Summer 2016..

SBC has over a 5 year supply of deliverable housing sites, and a significant number of employment sites identified in the local plan are under construction / completed.

## 2. Discussion of potential areas of cooperation

# a. Housing growth

A discussion was held around the potential level of new housing and employment provision in the new Staffordshire Moorlands Local Plan. The Core Strategy identifies need for 300 dpa. SBC did not identify any significant

concerns with the range of scenarios suggested in the NLP report. SBC did not have any concerns regarding the existing RIS at Blythe Bridge.

# b. Infrastructure Planning - Transport / Education / Health

MJ explained the response received from Highways England about the potential impact on the A50 from potential new development in the Moorlands and the need for further work. AY confirmed that this had not been raised as an issue for SBC during preparing the adopted Plan, and would be interested in knowing why Highways England wish to progress with a study.

SMDC to find out further information from the Highways England and discuss with colleagues at Staffordshire County Council.

# c. Northern Gateway

AY explained that SBC is actively involved in the 'Northern Gateway Development Zone' Partnership and have contributed £8K in funding evidence based work. With HS2 compatible trains serving Stafford Railway Station there is the potential for further regeneration schemes at Stafford Town Centre by attracting new investment.

## d. Green Belt

RW briefly outlined the recent Green Belt review undertaken by AMEC and the outcomes of the study. Comments on the review had been sought from neighbouring authorities. SBC did not respond to the consultation but the approach taken to the assessment in Staffordshire Moorlands was broadly accepted by SBC.

# e. GTAA

The joint GTAA covering the areas of Stafford, Stoke on Trent, Newcastle and the Staffordshire Moorlands has recently been completed. MJ explained that SMDC intends to accommodate the identified need on one or more allocated sites in the Staffordshire Moorlands Local Plan.

# 3. Memorandum of Understanding

MJ suggested a MoU between SMDC and SBC would be beneficial to set out those areas that the Councils could focus on. AY suggested updating the Duty to Co-operate pro-forma signed between our Councils in 2013.

ACTION – AY to forward copy of existing agreement to form basis of update.

# 4. <u>AOB</u>

None discussed

# Picture VI.3

# Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council and Newcastle Borough Council

Date: 2 Nov 2016

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Joanne Mayne (SoTCC)

Ruth Wooddisse (SMDC) Helen Beech (NBC)

# 1. Local Plan / LDF Updates

## **SMDC**

- OAN figures under review to take account of latest population projections.
   Expecting a range based on a number of scenarios. The review will also include employment land requirements.
- Local Plan timetable currently under review. Next consultation will include preferred options policies and sites.
- New evidence (Transport Cheadle, HRA, Level 2 SFRA, Heritage & Landscape, Open Space, Green Infrastructure)

# NBC & SoTCC

- Also reviewing OAN figures but likely to be one figure rather than a range.
   Anticipating student numbers will have an impact.
- Green Infrastructure Strategy would feed into SMDC Strategy trails and routes cross over LA areas. JM to send.

# 2. Discussion of potential areas of cooperation

Health – SOT & SoTCC had recently met with Community Health Partnerships regarding health infrastructure and local authority planning – HB to forward contact details.

Education – meeting to be arranged with SOTCC / SCC / SMDC regarding cross boundary school issues. RW to arrange.

Blythe Vale – MJ explained that following the Preferred Options consultation / responses SMDC is considering other employment uses and possibly some housing on the site. JM expressed general support but need to consider potential infrastructure requirements of development in this location. Railway station at

Blythe Bridge is over capacity. Impact on the A50 and the highway network also needs to be considered.

Biddulph Sites – SMDC awaiting responses to letters sent to NBC & SoTCC regarding potential housing sites on the southern edge of Biddulph outside SM administrative boundary . JM and HB to respond.

GTAA – No potential sites identified within SM at present. SoTCC also need to find additional pitches – no capacity at existing sites. The need for updated information based on definition change was discussed, however, was considered robust at Stafford Examination.

# 3. MOU

General discussion regarding need for an MOU and resources involved to keep up to date? MJ to find example to use as template.

# 4. Next meeting

MJ to arrange follow up meeting once SMDC have considered updated OAN figures.

Picture VI.4

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Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council and Newcastle Borough Council

**Date:** 14 January 2016 **Venue:** Moorlands House, Leek

Present: Ruth Wooddisse (SMDC) Joanne Mayne (SOTCC)
Mark James (SMDC) Helen Beech (NBC)

# 1. Local Plan / LDF update

# a. SMDC Options Consultation and forthcoming Preferred Options

MJ provided an update on the content and feedback from the Options Consultation held during the Summer of 2015. The consultation considered site options and wider policy matters and generated 5500 responses. Comments were being analysed to inform the preparation of the Preferred Options Local Plan which was due for public consultation in April 2016.

# b. SMDC evidence base update

MJ referred to the recently commissioned update to the assessment of the objectively assessed need for housing which was due to report back in late January. Latest update in July 2015 indicated a range of between 220 – 460 dpa. The SHMA indicates that the Moorlands has an overlapping HMA with Stoke and must continue to liaise with SoTCC and other nearby authorities to ensure that housing needs are met in full at a strategic level.

An assessment of plan and site viability had also been commissioned recently. It is also proposed to commission a heritage and landscape study to consider the impact and potential mitigation measures for the Preferred Options sites.

# c. SOTCC & NBC plan and evidence update

HB and JM explained that the Council's have started a review of the joint Core Spatial Strategy. Aiming to consult on a two-stage 'Issues and options' document with 'issues' likely in February 2016 and 'options' later in 2016. The current timetable indicates a draft plan by 2017 with adoption by 2018.

Recently commissioned a joint SHMA which indicates that Stoke and Newcastle have a self-contained HMA. Recognise the strong linkages with Moorlands – particular hotspots. The SHMA indicates a range for each Council area: Stoke 810-825 dpa, Newcastle 360 – 680 dpa. SoTCC aim continues to be to stem out-migration from the city. Both Councils have been working on their evidence base and updating the SHLAA.

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# 2. <u>Discussion of potential areas of cooperation</u>

#### a. Housing growth

A discussion was held around the potential level of new housing and employment provision in the new Staffordshire Moorlands Local Plan. The Core Strategy identifies need for 300 dpa. SOTCC and NBC did not identify any significant concerns with the range of scenarios suggested in the NLP report. SOTCC did not have any concerns regarding the existing RIS at Blythe Bridge.

ACTION – SMDC to consider commissioning additional work to support level of growth & relationship with SoTCC given strong HMA links identified in the SHMA.

# b. Infrastructure Planning - Transport / Education / Health

MJ explained the response received from Highways England about the potential impact on the A50 from potential new development in the Moorlands and the need for further work. JM said that Austin Knott was involved in work around the A50 along with Staffs County Council. Agreed that it was an area that would benefit from joint working. SMDC to follow up with Highways England and SCC.

General discussion about the Council's ambition to explore re-opening the railway line between Stoke and Leek in order to improve accessibility from the Moorlands to the Potteries and the wider area. The disused line is safeguarded in the SMDC Core Strategy. SoTCC are also involved in discussions around this.

RW outlined issues around the provision of school places within the SMDC area. JM added that there are also cross-boundary problems regarding the provision of buses / school transport.

ACTIONS – SMDC to follow up educational issues at a separate meeting with SoTCC and Staffordshire County Council School Organisation Team.

SMDC to find out further information from the Highways England and discuss with colleagues at Staffordshire County Council.

SoTCC and SMDC to consider including the Stoke-Moorlands railway link within a MOU.

SMDC to follow up health issues with Staffordshire County Council and Health Commissioning Groups.

# c. Northern Gateway

JM explained that the Northern Gateway Strategy, which seeks to demonstrate how the sub region might realise the economic potential arising

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from the development of a HS2 station at Crewe is still at a very early stage and is not being considered as part of the Joint Local Plan at present.

#### d. Green Belt

RW briefly outlined the recent Green Belt review undertaken by AMEC and the outcomes of the study. Comments on the review had been sought from neighbouring authorities.

#### e. GTAA

The joint GTAA covering the areas of Stoke on Trent, Newcastle, Stafford and the Staffordshire Moorlands has recently been completed. MJ explained that SMDC intends to accommodate the identified need on one or more allocated sites in the Staffordshire Moorlands Local Plan. JM commented that the greatest pressure in the Stoke on Trent area was for transit pitch provision.

## f. Suggested Sites

RW outlined the potential housing allocations in the Biddulph area and issues raised during the consultation. MJ explained that the SMDC 'call for sites' consultation had led to a number of new sites being suggested. Two of these were outside the Staffordshire Moorlands area south of Biddulph, one in SoTCC area and one in NBC area. MJ clarified that there are likely to be sufficient sites available within the Moorlands to meet the OAN for housing and employment.

JM and HB explained that the Council's were not at a stage to allocate sites. The two sites suggested were also considered to be in isolated/unsuitable locations and didn't relate well to existing urban areas. In addition issues were raised relating to contamination / protected coal reserves and re-

JM responded to issues raised in the recent SMDC consultation concerning the number of brownfield sites being available in the Stoke area. It may be that some sites will be released for housing instead. At this stage it is not clear if SoTCC will be able to meet their own employment / housing needs. Also SoTCC may also be under pressure to meet potentially unmet needs of NBC.

## 3. Memorandum of Understanding

MJ suggested a MoU between SMDC and SoTCC and NBC would be beneficial to set out those areas that the Councils could focus on.

 $\ensuremath{\mathsf{ACTION}} - \ensuremath{\mathsf{SMDC}}$  to scope a MoU for consideration by the SoTCC and NBC in due course.

## 4. AOB

None discussed

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## Picture VI.5

Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council, Newcastle Borough Council and Stafford Borough Council

Date: 2 Feb 2017

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Joanne Mayne (SoTCC)

Ruth Wooddisse (SMDC) Helen Beech (NBC)

David Davies (SMDC) Alex Yendole (SBC)

Anna Nevin (SBC)

# 1. Notes of last meeting between Staffs Moorlands, Stoke and Newcastle

- JM happy with the content of the notes. HB to review and send any comments on.
- RW to arrange education meeting with SoTCC and SCC
- MJ to chase response from Stoke re Biddulph site
- HB to send response from Newcastle
- SMDC to circulate Green Infrastructure plans for information

# 2. Local Plan / LDF update

## **SMDC**

- OAN figures been reviewed and suggest a reduced requirement for both housing and employment.
- Local Plan timetable currently under review, awaiting Housing White Paper. Next consultation will include preferred options policies and sites – likely to be in the summer.
- Need to revisit the spatial strategy to include Blythe Vale site.
- New and ongoing evidence (Transport Cheadle, HRA, Heritage & Landscape, Open Space, Green Infrastructure, ecological assessments)

# NBC & SoTCC

- OAN figures are currently being updated for each LPA. Expecting to consult on strategy document this summer.
- Currently working on Green Belt review and Green Infrastructure Strategy, consultation likely March / April time.
- SoTCC working on implications of growth on education needs
- · Newcastle working on a review of open spaces.

# SBC

- Just adopted Part 2 of the Stafford Local Plan. Full Local Plan now in place which includes sites.
- Robust 5 year land supply, currently at 6.7 years. Has been tested but other appeals ongoing.
- Sites are building out well. Applications pending for a large site north of Stafford totalling 3,000 homes.
- · Now considering a review.

# 3. GTAA

- General discussion around PAS and ARC4 feedback to SMD following queries about need for further needs assessment following change in traveller definition in 2015, and implications of this. ARC4 recommended that in light of this change of definition the figures included in the 2015 Arc4 GTAA be treated as a maximum rather than a minimum. All LPAs still need to allocate a site and this is unlikely to change. Cost of new study was discussed and would it actually change the need? It was questioned whether it was only PAS who are saying study is out of date (not for example, gypsy groups); also the current lack of case law regarding who counts as a 'traveller' may be problematic
- SBC and SMDC considered light touch update might be useful to inform respective Local Plans. SoTCC and NBC unsure of benefits at this stage.
- Collectively decided to leave a joint update for the time-being. Reconsider depending on the implications of the Housing White Paper.

# 4. Northern Gateway (NG)

- Currently anticipating this to be around 2040 although HS2 station at Crewe still not guaranteed.
- SoTCC and NBC Local Plan ends 2033. Staffs Moorlands runs to 2031.
   Stafford Local Plan runs to 2027.
- Stoke is looking at larger economic growth uplift prior to NG timescales. Aspiration for growth.
- Blythe Vale site in the Moorlands is referenced in the Northern Gateway Development Zone brochure

## 5. Housing and Employment growth

- SMDC SHMA and Employment updates based on 2014-based pop / oxford economics / post Brexit. The new range is 235 – 300 dph. The predicted growth in jobs has dropped significantly. The job stabilisation and jobs growth scenarios rely on in-migration.
- SoTCC and NBC are also reliant on in-migration, although SoTCC OAN also reflects natural change and some 'unknown' population.

- SBC and Cheshire East's plans also rely on in-migration.
- Discussion around the need to consider and understand in-migration at a sub-regional level. This could possibly be added onto the SoTCC / NBC contract with Turley's? However, as all LPA's are at a different stage. All to consider and report back.

# 6. MoU

MJ circulated example MoU at the meeting. General agreement regarding the need for a MoU which would be signed at submission stage.

# 7. AOB

Generally agreed that it would be beneficial for SoTCC, NBC, SBC and SMDC to keep meeting as a group and that more frequent meetings would be beneficial particularly due to an increase in strategic work.

Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council, Newcastle Borough Council and Stafford Borough Council

Date: 13 March 2017

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Alex Yendole (SBC)

Helen Beech (NBC) David Davies (SMDC)

# 1. Notes of last meeting between Staffs Moorlands, Stoke and Newcastle

AY clarified some text issues in the last minutes, such as the end date of Stafford BC Local Plan should state 2031 not 2027. Also that GTAA item should have referred to SBC are exploring traveller sites. Also that the applications for a large site north of Stafford for 3,000 homes have been *received* (not *pending*).

HB clarified that in relation to N Gateway, Stoke CC is looking at a larger economic growth uplift prior to NG timescales, in comparison to current Core Strategy. She also provided the update that a strategic options document had been published at NUL BC.

# **Updates/ Action Points**

The group discussed forthcoming actions to be carried out:

- MJ advised that Ruth Wooddisse (SMDC) is shortly arranging meeting with SCC regarding school requirements
- MJ advised that SMD are preparing a Green Infrastructure Plan as part of its emerging Local Plan

## **Green Belt Reviews**

- MJ and HB discussed how SMDC are considering land west of Victoria Business Park for allocation given response of local councillors: HB to send out Biddulph letter soon.
- Discussion about SMDC Green Belt Review findings that 'exceptional circumstances' required at this location; and proximity of it to Stoke boundary.
- HB advised that SOTCC/NULBC doing Green Belt Review. Discussion about
  what 'preventing coalescence of adjacent villages' and 'limited extension' etc
  mean; and how frequently GB boundary changes can be justified. SOT/NUL
  will have to consider Green Belt release. NUL must proceed with Local Plan-housing number 'options' discussed.

#### 2. Local Plan Update and Evidence

#### (a) GTAA

Discussion about whether SMDC need GTAA update given 2015 traveller definition change: as SMDC have Examination within 2 years questioned would evidence tally with submitted Plan then. AY&HB both considered additional study not justified given financial cost, and that they have Examinations in 2-3 years. SOT+NUL just express traveller pitch OANs as 'maxima'. AY advised that SBC looking to allocate another site, as a safety net if other SBC commitments don't materialise.

AY discussed whether SBC should support SMDC if SMDC decides to commission update. SBC may ask for written agreement if they undertake unilateral action in future.

Group discussed how long an update would take, how may seasons' surveys? Should advice be sought from DGLG? SMD could review any public reps following this summer's consultation and reach a view. Another possible solution would be to carry out interim summer surveys. Discussion about finding out what questionnaire questions should be asked: and could this be done in-house, or commission ARC4?

Discussion about differing views on the % of travellers living in bricks and mortar. DD advised that he attended a recent seminar about travellers by LEEDSGATE, that suggested a much higher %age than ARC4 suggested.

AY asked for clarification on details of a future CPD event on travellers.

#### (b) OAN

MJ advised that SMD have recommissioned NLP to re-assess housing OAN based on both Experian and Oxford Economic data. Using the 'average' between the two has led to a 330dpa *job growth* scenario. Council Assembly consequently approved a 320dpa this month.

HB advised that NUL have commissioned review of their SHMA. Using Cambridge Econometrics approach has led to higher housing range, so need to update current Core Strategy figure, especially if 'Policy on' scenario used (275 $\rightarrow$ 785 dpa). Similarly, the SOTCC OAN would increase from 800 $\rightarrow$ 900 dpa. HB advised that SOT and NUL SHLAAs don't have enough site capacity so will formally approach SMD about whether they can accommodate some. Discussion about resultant council tax revenue sharing etc.

SBC – No change until at least start of Local Plan review. Consultation on SA Scoping report. Call for sites this summer. Looking into Green Infrastructure strategy.

#### (c) Wider HMA assessment

The group discussed assumptions used by consultants about inward migration rates; and how can neighbouring authorities all benefit from in-migration at same time. Inspectors question this. Historic rates from as far back as 2009 have been used. NLP do not make predictions about *future* migration movements.

It was questioned by AY whether the four LPAs need SOCG about this: however MJ thought this was impractical given the authorities were all at different Plan stages.

HB said that Turley consultants state that historic inward migration patterns should always be matched – questioned whether this should be investigated as part of N Gateway work.

# 3. Housing White Paper -SOCG

SOCG to pick up on shared approach around GTAA work. MJ to draft this.

Revised NPPF this summer? MJ discussed recent PAS event. The housing delivery test in HWP was still open to consultation. The group discussed the 3 year rule on housing delivery and that it could mean adopted Local Plans with 5 year housing supply could still be considered out of date. Recent sec of state decisions stating housing delivery is more important than 5YHS.

#### **AOB**

HB – asked if SCC had done Transport Modelling for SBC? AY: Yes (Saturn Model). MJ discussed ongoing Cheadle Transport Study (SMDC paying AMEY to complete). Discussion about SCC's responsibility to conduct transport modelling for LPAs.

Date of next meeting: suggested late April date. To be agreed

Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council, Newcastle Borough Council and Stafford Borough Council

Date: 23 May 2017

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Alex Yendole (SBC)

Helen Beech (NBC) Joanne Mayne (SoTCC)

Ruth Wooddisse (SMDC)

# 1. Note of last meeting

Some amendments to the note of the last meeting required. AY, HB and JM to clarify.

Also amendment required to previous meeting note. JM to advise.

# 2. Local Plan Update

# **SMDC**

Purdah led to delay of Local Plan consultation. To be agreed by Council on the 12<sup>th</sup> July, consultation due to start on the 24<sup>th</sup> July until 15<sup>th</sup> September. Plan is for 320 dpa (based on 2014 population projections).

- Biddulph some changes to sites particularly in the Green Belt.
- Leek focus to the east of the town
- Cheadle same sites as before
- Rural Area most change. Number of the sites in the Green Belt have been removed in village locations and Blythe Vale, Blythe Bridge has been included for up to 300 dwellings.

Due to commission SHELA / SHLAA / brownfield land work/update.

# SoTCC / NBC

SoTCC & NBC due to start consultation on Strategic Options in mid-July for 6 weeks. It will include housing and employment growth scenarios and include broad locations for housing and employment development. OAN is 1390 per annum across both authorities. This includes an adjustment for higher levels of household formation amongst younger people.

# <u>SBC</u>

LDS due to go to Cabinet in July.

- First stage will be to consult on a Sustainability Appraisal Scoping Report and a 'call for sites'.
- Also working on three SPD's, design, shopfronts and rural buildings.
- Awaiting OAN methodology before updating SHMA.

#### 3. GTAA

SMDC unlikely to do GTAA update. Using criteria based policy in Local Plan as not a site to accommodate need. Still exploring opportunities to secure site. Discussed options around securing a site using CPO powers.

# 4. GI Strategy

SMDC produced draft GI strategy inhouse. Will be consulting on this as part of the Local Plan consultation in July. Links with adjacent authorities.

# 5. Local Plan costs

Discussion around costs to produce a Local Plan. Estimates between £350-£500K including evidence base documents and examination costs.

#### 6. AOB

Joint working - opportunities for brownfield land register /SHELA.

Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council, Newcastle Borough Council and Stafford Borough Council

Date: 16 Oct 2017

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Alex Yendole (SBC)

Helen Beech (NBC) Joanne Mayne (SoTCC)

Ruth Wooddisse (SMDC)

# 1. Local Plans Update and evidence

a) Local Plans Update

MJ confirmed that the SMDC Preferred Options consultation closed on 22<sup>nd</sup> September and LUC consultants were processing responses. Timetable is to publish the Local Plan in Feb 2018 and submit in June 2018. Likelihood of a revised NPPF in early 2018 may mean an implication for the SMDC timetable.

JM and HB referred to the SoTCC and NBC Strategic Options consultation for the Joint Local Plan which closed on the 22<sup>nd</sup> August and generated about 150 separate responses. HB said that NBC would like to consult on Preferred Options before May 2018. JM confirmed that SoTCC is currently considering the next stages but could struggle to meet the NBC timetable.

AY provided update regarding SBC consultation on SA scoping report. SBC are intending to appoint consultants to undertake the SA. A number of other consultations are currently running which includes a 'call for sites' (until Jan 2018) and three SPD's covering design, rural buildings and shop fronts.

AY also referred to the Brownfield Land Register which is due to go to the SBC Cabinet.

# b) OAN

Discussion around the consultation on the Standard Metholodgy for calculating objectively assessed housing need which was issued by the government in mid September.

MJ stated that it could have a significant implication for SMDC. The standard methodology indicates 193 dwellings per annum based on household growth projections compared to 320 dwellings per annum in the Preferred Options Local Plan.

HB confirmed that the standard methodology indicated a lower figure of 361 dwellings per annum for NBC compared with 586 identified in the Strategic Options Growth Scenario. JM stated that the figures were also lower for SoTCC, 486 dwellings per annum compared to 804. SoTCC were seeing a higher number of housing completions, movement particularly seen on brownfield sites (after government intervention) and considered that the lower level suggested by the household growth projections were not realistic and would not support jobs growth.

AY confirmed that the adopted SBC Local Plan aims to deliver 500 dwellings per annum compared with the suggested 424 per annum but SBC is already running out of sites so a lower figure unlikely to be appropriate.

#### c) GTAA and sites

MJ confirmed that the Local Plan Preferred Options document does not identify a site to accommodate the needs identified in the GTAA but SMDC is currently exploring the suitability a site that has been put forward for by a landowner. HB said that NBC had agreed a joint methodology to identify sites and considering if expansion of an existing site would be an option. SBC currently doing a search for potential sites.

#### d) GI Strategy

SMDC invited comments on GI strategy alongside Local Plan consultation. SoTCC has fed back comments. SBC generally happy but raised issue regarding overlap into SBC area.

#### 2) Constellation Partnership Growth Strategy

MJ drew everyones attention to the draft Technical Narrative report prepared on behalf of the Constellation Partnership. The deadline for comments was due by the 17<sup>th</sup> October.

#### 3) Blythe Vale

St Modwen had submitted a planning application for housing on the Blythe Vale Regional Investment Site and MJ had requested that SoTCC and SBC were consulted.

MJ stated that work was to due to start on a Masterplan for the wider Blythe Vale site which would include neighbouring LPA's and Highways England. AY asked about costs and who was going to fund it? MJ confirmed that at this stage the cost was still to be determined and funding opportunities were being looked at.

# 4) Statement of Common Ground (SoCG)

MJ stated that the SoCG would need to be agreed by February 2018 and signed off by participating LPAs at a Councillor level. Discussion around content and area covered by a SoCG. AY offered suggested template drafted by POS.

Suggested areas to include:

- HMA issue
- Constellation Partnership
- Blythe Vale
- Green Belt
- GI Strategy
- Education

 $\operatorname{ACTION}-\operatorname{AY}$  to send draft POS response on SoCG. MJ to circulate draft SoCG prior to next meeting.

# 5) Date of next meeting

It was agreed that a date before Christmas would be arranged.

6) AOB

None.

Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council, Newcastle Borough Council and Stafford Borough Council

Date: 18 Jan 2018

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Alex Yendole (SBC)

Joanne Mayne (SoTCC) Janet Belfield (NBC)

Ruth Wooddisse (SMDC)

Apologies received from Helen Beech (NBC)

#### 1. Local Plans Update

- SoTCC / NBC due to commence Joint Local Plan Draft Preferred Options consultation on February 1<sup>st</sup> 2018 for 4 weeks. The Plan identifies a requirement of 27,800 dwellings between 2013-2031 of which 16,080 are in Stoke and 11,720 are in Newcastle. Newcastle are looking to provide approximately 3000 dwellings in the Green Belt and currently have an identified shortfall of 2099 dwellings. The preferred site supply for employment land is 230 hectares of which 75% for industry and 25% for offices, research and development. The largest strategic housing site is identified west of Newcastle in the vicinity of Keele University campus (2,500 on three sites). The second largest site is located in Stoke-on-Trent at Berryhill.
- SBC recently consulted on a SA scoping report and undertaken a 'call for sites'.
   Also working on the adoption of three SPD's relating to Design, Re-use of Rural Buildings and Shopfronts and Advertisements. Intension is to produce Issues and Options in July 2018 and review the vision, hierarchy, policy areas etc. The new plan will look up to 2040.
- SMDC timetable is to publish the Local Plan on 27<sup>th</sup> Feb 2018 and submit in June 2018. No new allocations.

#### 2. Draft Statement of Common Ground

a) PAS Pilot

SoTCC and NBC not heard anything regarding the PAS SOCG Pilot Project

b) Duty to Co-operate Statement

SMDC Duty to Co-operate Statement drafted to support the Submission Version Local Plan. MJ asked for comments to be emailed back by the 20<sup>th</sup> Jan.

c) Draft Statement of Common Ground

Discussion regarding other information to be included and amendments. MJ to send out further draft of SoCG for comments and to all to add in text relating to various areas.

ACTION - all to add short summaries into the draft SoCG.

SMDC will also send out letters to SBC, SoTCC and NBC relating to unmet housing and travellers needs.

MJ also to forward Highways England comments regarding Blythe Vale site.

# 3. Date of next meeting

It was agreed that another meeting should be arranged to discuss draft SoCG. MJ to circulate potential dates.

# 4. AOB

None

Note of Planning Policy meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council, Newcastle Borough Council and Stafford **Borough Council** 

Date: 6 March 2018

Venue: Moorlands House, Leek

Present: Mark James (SMDC) Alex Yendole (SBC)

Joanne Mayne (SoTCC) Helen Beech (NBC)

Guy Benson (NBC) Ruth Wooddisse (SMDC)

# 1. Local Plans Update

- SoTCC / NBC consultation on Joint Local Plan Draft Preferred Options finished on 1<sup>st</sup> March. Significant amount of comments received, exact number not known at this early stage. A number of petitions also received. Aim to report to relevant committees by September 2018. There is still a housing shortfall identified in the NBC area. SoTCC received HIF funding which will help delivery of brownfield sites. Due to consult on gypsy and traveller accomodation June/ July time.
- SBC received a good response to the recent a 'call for sites'. Working on draft methodologies for SHELAA and SCI. Intend to produce Issues and Options in July 2018 and review the vision, hierarchy, policy areas etc. The new plan will look up to 2040.
- SMDC published the Submission Version Local Plan for consultation on the 27<sup>th</sup> Feb 2018. Closing date for comments is 11<sup>th</sup> April 2018. According to the timetable SMDC intend to submit the plan by the end of June 2018. There have been a few minor tweaks to policies to reflect comments from statutory organisations and a few minor changes to site boundaries following the consultation.

#### 2. Draft Statement of Common Ground

a) PAS Pilot

SoTCC and NBC not heard anything regarding the PAS SOCG Pilot Project.

b) Duty to Co-operate Statement

MJ thanked everyone for their input into the SMDC Duty to Co-operate Statement which was published alongside the Submission Version Local Plan. All to check the content as a final version with additional notes of meetings etc will be submitted with the Local Plan at the end of June 2018.

- c) Draft Statement of Common Ground
  - SMDC sent letters to SBC, SoTCC and NBC on 8<sup>th</sup> February 2018 relating to unmet housing and traveller's needs.
  - Draft SoCG had also been circulated by MJ. AY had added sections for Stafford BC.
  - MJ updated group on recent planning approval for 3 traveller pitches at Checkley.
  - Discussion around Blythe Vale Strategic Allocation. Outline planning approval
    has already been granted for 118 dwellings. Employment provision on the site
    is separate to the district requirement and reflects the same approach in the
    adopted Core Strategy.
  - Strategic cross boundary matters agreed. Question whether education should be included? RW to ask SCC Education for data relating to cross boundary pupil movements.

The SoCG needs to be completed so that it can be signed by all authorities by the end of May.

- MJ to email each Council regarding timescales for signing document.
- NBC and SoTCC to add short summaries into the draft SoCG by 16<sup>th</sup> March 2018.
- All to respond to SMDC letter of 8<sup>th</sup> February regarding unmet housing need and gypsy and traveller accommodation.

### 3. Date of next meeting

It was agreed that another meeting should be arranged to conclude SoCG. MJ to circulate potential dates.

#### 4. AOB

- Brief discussion regarding NPPF Consultation which commenced on 5<sup>th</sup> March and runs until 10<sup>th</sup> May 2018.
- Education contributions and viability issues.
- AY asked if other LPAs adopt SuDs land? All to feedback at next meeting.

# Note of Planning Policy meeting between Staffordshire Moorlands District Council and Cheshire East Council

Date: 12 January 2016

Venue: Moorlands House, Leek

Present: Ruth Wooddisse (SMDC) Stuart Penny (CEC)

Mark James (SMDC)

# 1. Local Plan / LDF update

#### a. SMDC Options Consultation and forthcoming Preferred Options

MJ provided an update on the content and feedback from the Options Consultation held during the Summer of 2015. The consultation considered site options and wider policy matters and generated 5500 responses. Comments were being analysed to inform the preparation of the Preferred Options Local Plan which was due for public consultation in April 2016.

# b. SMDC evidence base update

MJ referred to the recently commissioned update to the assessment of the objectively assessed need for housing which was due to report back in late January. An assessment of plan and site viability had also been commissioned recently. It is also proposed to commission a heritage and landscape study to consider the impact and potential mitigation measures for the Preferred Options sites.

## c. CEC plan and evidence update

SP explained that following the examination hearing sessions in October the Council will be taking a Local Plan report to full Council on 26<sup>th</sup> February 2016. It is anticipated that consultation will following during March / April 2016. The revised plan identifies a requirement for 36,000 new homes between 2010-2030. Following the consideration of responses the Council is likely to submit further information to the Inspector around June time. The final stage of the Local Plan Strategy Examination is likely to be during September and October 2016 and will largely focus on sites e.g. around 30 strategic housing / employment sites (sites accommodating 150+ dwellings or larger than 5 hec) are allocated in the LPS.

#### 2. Discussion of potential areas of cooperation

### a. Housing growth

A discussion was held around the potential level of new housing and employment provision in the new Staffordshire Moorlands Local Plan. RW outlined the potential housing allocations in the Biddulph area and issues raised during the consultation. CEC did not identify any significant concerns

with the range of scenarios suggested in the NLP report and the potential allocations identified in the Biddulph area.

ACTION – SMDC to continue informing CEC on progress of the plan and consult as appropriate.

#### b. Infrastructure Planning - Transport / Education

SP explained the additional work that CEC was undertaking on strategic highway issues. Brief jointly prepared with Staffordshire County Council. Study currently being undertaken by JMP. In additional to identifying highways issues it will look at potential mitigation / public transport services and scope for contributions from developers. It will cover the Moorlands area, including links between Congleton to Biddulph. Final study available within the next couple of months.

Additional work is also being undertaken by Cheshire East and Staffordshire County Council around planning for educational needs. It is envisaged that there will be a joint approach to this, particularly when dealing with new sites coming forward close to the border.

ACTION - SMDC to follow up any outcomes with Staffordshire CC and CEC.

#### c. Green Belt

RW briefly outlined the recent Green Belt review undertaken by AMEC and the outcomes of the study. Comments on the review had been sought from neighbouring authorities. Cheshire East Council did not respond to the consultation but SP commented at the meeting that the approach taken to the assessment in Staffordshire Moorlands was broadly consistent with that applied in Cheshire East.

#### d. Northern Gateway

SP outlined CEC role in the Northern Gateway. Largely affects central and southern Cheshire East towns, Winsford & Northwich in Cheshire West and Newcastle and Stoke on Trent areas and is based around HS2 running through Crewe. This is still at a very early stage and will affect the next plan i.e. post-2030. Growth will be focussed around Crewe and will require improvements to transport corridors in the area. Recent works to M6 Junction 16 have recently been completed.

### 3. Memorandum of Understanding

An MoU between SMDC and the CEC was signed in August 2014. All parties agreed that it would be beneficial to update this later this year to reflect the up to date position in relation to development requirements, Green Belt,

infrastructure and potentially future planning related work in relation to the Northern Gateway

ACTION – SMDC to draft an updated MoU for consideration by the Cheshire East Council in due course.

4. <u>AOB</u>

None discussed

Picture VI.12

# Note of Planning Policy meeting between Staffordshire Moorlands District Council and Cheshire East Council

Date: 5 Dec 2017

Venue: Westfields, Middlewich Road, Sandbach

Present: Mark James (SMDC) Stuart Penny (CEC)

Ruth Wooddisse (SMDC)

#### 1) Note of Last Meeting

Last met in January 2016 at Moorlands House, Leek.

#### 2) Local Plan update

- a. SMDC Preferred Options Sites and Boundaries 2016, Preferred Options Local Plan 2017. Intend to consult on publication version February /March 2018 and submit in June 2018. Preferred Options Local Plan based on 320 per annum. Cheshire East responded to the latest consultation but did not raise any issues.
- b. CEC have adopted their Local Plan Strategy in July 2017 (2010-2030). Based on an average of 1,800 per annum over the plan period. Currently preparing a Part 2: Site Allocations and Development Policies Document (SADPD) which will allocate the remaining sites needed for future development and set out further detailed planning policies to be used when considering planning applications. The first stage of consultation on the Issues Paper was undertaken in early 2017. Looking to consult on the sites in summer 2018. Part 3 of the plan will address Minerals.
- c. Almost half the Cheshire East area has or is in the process of preparing a Neighbourhood Plan. There is a page outlining progress on the Council's website.

### 3) Infrastructure

- a. CEC intend to take forward CIL but are awaiting latest guidance. A
  draft charging schedule has been prepared and the Council is
  expecting to agree this in early 2018.
- b. Transport Study- CEC agreed with Staffordshire County Council to produce a study to look at impact of growth on Staffordshire highway network. A high level study has already been done but further work is planned in the future that will consider HS2 and cumulative growth from Stoke and Newcastle areas. SMDC involvement is to a lesser scale although there are links in the north in the Congleton/Biddulph and Macclesfield/Leek Areas.

c. Blythe Vale allocation in SMDC Local Plan– Highway England has requested a need for further modelling work along the A50. Also need to consider growth in several neighbouring authorities such as Stoke/Newcastle/Stafford.

# 4) GI Strategy

- a. SMDC published its GI Strategy with the Preferred Options Local Plan in July 2017. It is intended to update this and publish with the Local Plan. Next stage is to look at an Action Plan.
- **b.** CEC intend to update Green Spaces Strategy in near future.

#### 5) Green Belt

- a. SMDC Local Plan intends to release some Green Belt land to meet development requirements in Biddulph.
- CEC released Green Belt land to meet development requirements across the CEC area.

# 6) Potential Issues to be covered in Statement of Common Ground (SoCG)

- Highways Infrastructure
- Education SCC previously commented on school places. Check with James Chadwick (SCC) how this is being dealt with?
- Green Infrastructure
- Green Belt shared boundary.
- Constellation Partnership CEC to consider this post 2020.

# Note of Planning Policy meeting between Staffordshire Moorlands District Council and East Staffordshire Borough Council

Date: 21 Nov 2017

Venue: The Maltsters, Burton-upon-Trent

**Present:** Mark James (SMDC) Jeff Upton (ESBC)

Ruth Wooddisse (SMDC) Naomi Perry (ESBC)

#### 1) Note of Last Meeting

Note prepared in 2013. Didn't identify any major issues between the two LPA's.

#### 2) Local Plan update and evidence

- a. SMDC Site Options 2015, Preferred Options Sites and Boundaries 2016, Preferred Options Local Plan 2017. Intend to consult on publication version February /March 2018 and submit in June 2018. Preferred Options Local Plan based on 320 per annum.
- b. East Staffs Local Plan adopted 2015 (2012-2031). Based on an average of 600 per annum over the plan period and 40 hectares of employment land. Borough has seen lots of movement on sites since adoption and completions high. Large greenfield sites for 750 + 400 dwellings identified in Uttoxeter for housing. Site south of Rocester identified for 90 dwellings. A review is planned after 5 years of adoption. No boundaries identified around some of the villages.
- c. ESBC has 16 Neighbourhood Plans of which a high number are Made. Denstone and Uttoxeter both have Neighbourhood Plans. The Plan provides housing numbers for Neighbourhood Plan areas.

#### 3) A50

- a. Blythe Vale Highway England has requested a need for further modelling work along the A50. Also need to consider growth in several neighbouring authorities. Commitment in SoGC's to undertaking work in future.
- Highway improvement works expected within East Staffs area along A50 close to Uttoxeter.

#### 4) Alton Towers Transport Liaison Group

Both SMDC and ESBC attend this group which is led by Staffordshire County Council. It considers traffic issues arising from the resort and mitigation measures within the remit of the AT legal agreement.

# 5) Churnet Valley Living Landscape Partnership (CVLLP)

Both SMDC and ESBC attend this partnership group which coordinates projects and funding in the Churnet Valley.

- 6) Issues to be covered in Statement of Common Ground (SoCG)
- A50
- CVLLP
- Alton Towers
- Travellers Pitches

# Note of Planning Policy meeting between Staffordshire Moorlands District Council and Staffordshire County Council

Date: 28 January 2016

Venue: Staffordshire Place 1, Stafford

#### Morning session:

Present: Ruth Wooddisse (SMDC) James Chadwick (SCC)

Mark James (SMDC)
Mark Parkinson (SCC)
Jane Cole (SCC)

Mark Dawson (SCC)

Mick Dawson (SCC)

Joanne Keay (SCC)

#### 1. Local Plan / LDF update

RW provided an update on the content and feedback from the Options Consultation held during the Summer of 2015. The consultation considered site options and wider policy matters and generated 5500 responses. Comments were being analysed to inform the preparation of the Preferred Options Local Plan which was due for public consultation in April 2016.

RW/MJ also provided an update of the various evidence based studies which had recently been completed. This included the Cheadle Transport Study, a Green Belt Review, a Ecology Study, Gypsy and Traveller Needs Assessment. In addition the Council has received an update to the housing requirement which indicated a range between 250 – 440 dwellings per annum. The Council is due to make a decision on the overall housing requirement in March 2016.

RW circulated a schedule which estimated the requirements for the towns and the rural area based on the 320 dpa which was based on the jobs stabilisation scenario with an uplift for affordable housing.

# 2. Towns

## Leek

RW outlined the latest position regarding the Leek site options and feedback from the consultation. General discussion around windfall sites in the town centre and what contribution this is likely to make to housing numbers. RW agreed to send some further figures which include numbers for sites.

TS & JCo confirmed that Leek has a shortage of school first school places. Based on the level of future housing it is anticipated that there will be the need for a new first school and this should be located as close as possible any new housing. Suggested approach would be a masterplan for the area including a

school. JCh asked about status of the open space adjacent to Leek High School. RW to check.

Expressed concern about potential housing on site LE150 (currently proposed as mixed use) as the adjacent All Saints First School is full and there is no room for expansion.

There is also a need for additional middle school places. Given the growth is most likely to be to the east of the town, Churnet Middle School may need an expansion. RW said that land had been put forward by a landowner for housing adjacent to the school and they may be an opportunity in this area. JK raised issue about a track that dissects both sites.

Also issue raised about Early Years provision across the District. Matt Biggs (SCC) to feed observations back.

SMDC struggling to get information back regarding need for doctors/dentists. GE confirmed that one of the doctors surgeries had recently been extended. GE to pass on contact details of relevant contacts.

Action	Officer	Complete
Further information around sites	RW	
(numbers).		
RW to send JCh details regarding	RW	
status of the playing field and		
suggested site.		
Send health contacts to SMDC	GE	
Matt Biggs to feed back Early	JCo	
Years info to SMDC		

## Biddulph

RW outlined feedback from the consultation and additional sites identified in the Green Belt review. SMDC are undertaking further work around these sites. RW to send Jane Cole plan with new sites identified. RW agreed to send some further figures around potential sites / windfall allowance.

TS confirmed that Biddulph is likely to need a new first school and expansion of a middle school based on the numbers anticipated. New first school would be best placed on one of the new areas. GE said that there could be capacity within Area 4 (Core Strategy).

JCh raised issue around viability of the sites identified due to previous mining activity.

Action	Officer	Complete
Further information around sites	RW	
(numbers).		

Send map to Jane with new sites	RW	
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#### Cheadle

RW outlined site options in Cheadle and representations received. General discussion around various options for growth around Cheadle. Three options identified a) north eastern focus b) south western focus c) scattered approach. General agreement that a grouping of sites would deliver more infrastructure benefits than a scattered approach.

TS/JC confirmed that a new primary school was still likely. Generally thought that the location of a new school would be beneficial in the north east sector of the town. SMDC have received a representation proposing the inclusion of Area1 (Core Strategy) plus adjacent area CH132 which included land for a new school as part of the site options consultation. GE said that some areas of housing particularly to the north of the town were some distance from the existing schools. Also potential benefits to traffic in the town centre. JK to identify how many existing properties are in the area and could feed into a new school catchment.

General discussion around the benefits of a link road to join Brookhouse Way and Tean Road via site CH128. Comments received from David Plant (SCC) confirm that a significant number of new houses could be accessed directly off Tean Road via CH128, but there would benefits by joining up these two roads. ND was unsure about the wider benefits of a link road and whether this could be justified in the Local Plan. Also issues around cost – particularly railway embankment. MJ confirmed that the recent Cheadle Town Centre Study didn't consider the SW link but SMDC planned to undertake some additional work at the preferred options stage. ND to consider what highways evidence was available to support the inclusion of a link road.

GE considered that health facilities in Cheadle needed expanding and that there was a need to explore options.

Action	Officer	Complete
JCh to supply SMDC with info	JCh	
regarding size required for new		
school buildings, yard and playing		
field.		
Information on existing housing	JK	
numbers in the north east sector.		
ND to consider implications of a	ND/JK	
SW link road.		

#### Afternoon session 1: Rural Area - Education

Present: Ruth Wooddisse (SMDC) James Chadwick (SCC)

Mark James (SMDC) Jane Cole (SCC)

JCo clarified that there are cross-boundary issues regarding school places to the west of the District. Schools particularly in Werrington, Blythe Bridge, Endon and Brown Edge have a high percentage of children who travel in from Stoke. Need to meet with Stoke CC to understand how new development within SMDC will impact on Stoke CC school places and what plans Stoke have to meet their own needs.

JC explained that generally in the rural areas the number of school places was not an issue. There is either sufficient capacity or opportunities for expanding existing schools. In some locations additional housing could support schools where there is a lower number on the school role.

Action	Officer	Complete
JCo to provide RW with Stoke CC education contact. RW to arrange	JCo / RW	
joint meeting.		
Need for a MOU with Stoke City to deal with issues around school	JCh / JCo	
places.		

### Afternoon session 2: Rural Area - Highways

Present: Ruth Wooddisse (SMDC) James Chadwick (SCC)
Mark James (SMDC) Joanne Keay (SCC)

RW provided an update on the comments received in relation to the consultation. Comments have been received from both SCC Development Management and SCC Strategic Highways.

Discussed issues raised around Upper Tean junction – particularly with planned growth in Cheadle. JK said census data is available such as Cheadle travel to work data and Accident data for Upper Tean.

Discussed issues raised by Highways England around A50 corridor. JK said 'Trad' data is available for the A50 junctions and is available online. SMDC to clarify scope of the assessment with Highways England.

Action	Officer	Complete
Check what data is available for	JK	
Cheadle and Upper Tean and		
timescales for reporting back .		
Clarify with Highways England	RW	
scope of the study required.		

# Afternoon session 3: Other issues

Ruth Wooddisse (SMDC) James Chadwick (SCC) Mark James (SMDC) Present:

No issues raised at present regarding minerals and waste or libraries.

JCh explained SCC preference for CIL due to the difficulties of pooling s106 Agreements.. MJ explained that the SMDC is currently updating a CIL Viability Study and expects the Council to take a decision on this in the near future.

Note of Education meeting between Staffordshire Moorlands District Council, Stoke on Trent City Council and Staffordshire County Council

Date: 23 April 2018

Venue: Moorlands House, Leek

Present: Mark James (SMDC) James Chadwick (SCC)

Joanne Mayne (SoTCC) Jane Cole (SCC)

Ruth Wooddisse (SMDC) Melanie Hughes (SoTCC)

Greg Trotman (SoTCC)

# 1. Background

During SMDC duty-to-cooperate meetings with SoTCC and SCC a potential issue around cross-boundary education provision had been raised. This particularly affects schools within SMDC (Staffs schools) in the settlements of Endon, Werrington and Blythe Bridge located on the western edge of the District close to the SoTCC border.

#### 2. Data - sharing

GT shared data relating to children residing in SoTCC but attending a SCC school. Figures were provided for Primary places and Secondary places allocated between 2014 and 2018.

#### Points of clarification:

- A high number of children in SoTCC are requesting SCC schools on an annual basis. This can be because of geographical reasons, family connections and school standards. These figures have remained relatively stable over the last few years.
- Catchment areas for some schools extend into SoTCC.
- The High schools prioritise pupils from surrounding feeder schools.
- Academies are making school planning more difficult as they can set their own admissions criteria.
- Also Catholic schools in the area have their own admissions criteria.
- Siblings can also add additional complication as they have a priority.

# 3. Future Planning

JCo and GT have liaised on recent planning applications however there is a need to share and plan for future growth.

High schools in central SoTCC are nearly full and further housing growth is identified in the emerging Local Plan. There are no major housing allocations

planned at this stage close to the SMDC border that would impact on school places.

Some SoTCC schools are similarly affected by a high number of children resident in the Newcastle area.

# 4. Statement of Common Ground (SoCG)

JCh considered that a SoCG would help to demonstrate that SCC and SoTCC were working together to deliver sufficient school places for the area. This could help avoid challenges in the future.

SCC have already agreed a SoCG on a similar basis with Warwickshire and a MoU with Cheshire East. JCh to circulate these as examples and work up a draft 'high level' SoCG with SoTCC which would likely cover methodology, what will be published and how often the group will meet.

 $\,$  MJ and JCh agreed that education would also be covered in a 'local' SCC and SMDC SoCG.

Appendix 3 - Correspondence

June 2018

# **Appendix 3 - Correspondence**



Our ref: SHARE/ Your ref: Staffordshire Moorlands Local Plan, Blythe Bridge

Mark James
Planning Policy
High Peak Borough Council and Staffordshire
Moorlands District Council
Via Email: mark.james@highpeak.gov.uk

Graham Broome Asset Manager Operations Directorate

The Cube Highways England 199 Wharfside Street Birmingham B1 1RN www.highways.gov.uk

Direct Line: 0300 470 2860

12<sup>TH</sup> May 2017

Dear Mark.

# STAFFORDSHIRE MOORLANDS LOCAL PLAN - BLYTHE BRIDGE

Thank you for the opportunity to comment on this proposed scheme for a residential and mixed-use development to the southwest of Blythe Bridge on land previously identified as a Regional Investment Site in the adopted Core Strategy (2014)..

Highways England is responsible for the operation and maintenance of the strategic road network in England. The network includes all major motorways and trunk roads. The strategic road network in the Staffordshire Moorlands Council administrative area consists of a section of the A50 trunk road.

Highways England understands that Staffordshire Moorlands District Council is currently considering the scope for residential development as part of a mixed-use scheme on the Regional Investment Site, as identified in the Core Strategy at Blythe Bridge.

# **Previous Comments**

In September 2015 Highways England commented on the Consultation on Draft Site Allocations and Development Boundaries. Our analysis focused on sites where development has the greatest potential for traffic implications on the A50.

We outlined how any new developments close to the A50 were likely to generate additional pressures on this already-congested section of the SRN, both during construction and throughout the lifetime of the development. We also indicated that the cumulative impact of development sites in Cheadle and Blythe Bridge / Forsbrook would need to be considered in a robust assessment, and that Transport Assessments / Statements for forthcoming developments in these areas would need to fully consider the impact on the SRN.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ Highways England Company Limited registered in England and Wales number 09346363





It was considered possible that capacity improvements may be required, especially in the vicinity of Blythe Bridge, to ensure the route would continue to operate safely and that there could be a need for forthcoming Transport Assessment / Statements to consider the need for contributions towards emerging infrastructure schemes.

#### **Current Comments**

The proposed development would be a departure from previous proposals that have been for employment uses only. The comments provided below are those offered in response to the questions provided to Highways England by Staffordshire Moorlands District Council within an email dated 26<sup>th</sup> April 2017.

Do you have any initial view on the prospect of housing being developed as part of a mixed-use scheme on the Blythe Vale RIS site?

On account of the location and proposed usage of the scheme, there are concerns with regard to how sustainable access for Non-Motorised Users (NMUs) will be provided. The A50 corridor does not currently provide any means of pedestrian crossing facility within the vicinity of the site.

Consideration should therefore be given during the plan-making stage to sustainable transport modes, connectivity and physical improvements required to support the proposed allocation. It is suggested that these considerations could also form part of a development Travel Plan and any pedestrian improvements examined with a Non Motorised Users (NMU) audit.

At this stage no detail has been submitted with regard to the means of vehicular access to the site. It is understood from prior consideration of the site that this would include a bridge over the A50 in order to connect the two sites, with access onto the local road network then provided from the northern land parcel. This would be Highways England preferred option for accessing the site.

In the event that an option for the creation of new junction or direct means of access from the A50 needs to be considered, this should be undertaken as part of the planmaking stage in consultation with Highways England. As the A50 is near motorway standard, paragraphs 39 and 40 of Department for Transport Circular (02/2013) will apply.

The environmental impact of the development will also need to be assessed. New development close to the SRN will need to demonstrate that sufficient noise reduction measures are considered, to ensure any new housing is not affected by traffic noise generated from the trunk road.

If the council were to commission a masterplan, would Highways England like to be involved, given the proximity of the site to the A50?

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In light of the issues outlined above, and the potential impact on the operation and functionality of the SRN, Highways England would seek to be involved in the development of a masterplan for the site.

On account of the location and scale of the proposed scheme, we would be keen to ensure the site is highly permeable, in order to provide suitable access for NMUs.

Any required mitigation identified through assessment of the environmental impact of the development must be erected on the developers land, far enough from the Highway Boundary to enable maintenance to take place without encroachment.

Pre-application discussions with St Modwen are expected shortly. To what extent would you like to be involved at this stage?

Highways England encourages all parties promoting planning applications that may have an impact on the SRN to engage with them as early as possible, so Highways England can work collaboratively with the applicant to deliver positive outcomes as quickly as possible.

Our engagement at the pre-application stage gives all parties maximum time to understand the impacts of proposed development on the SRN. It also allows time to undertake the level of assessment required to understand impacts, and to agree the most appropriate actions required as a result to help ensure the development proposal is sound and deliverable.

On account of the issues outlined above, which centre predominantly on access to the site and sustainable access in the locality, Highways England would seek to be fully involved with developers on transport elements of the proposed development from the outset.

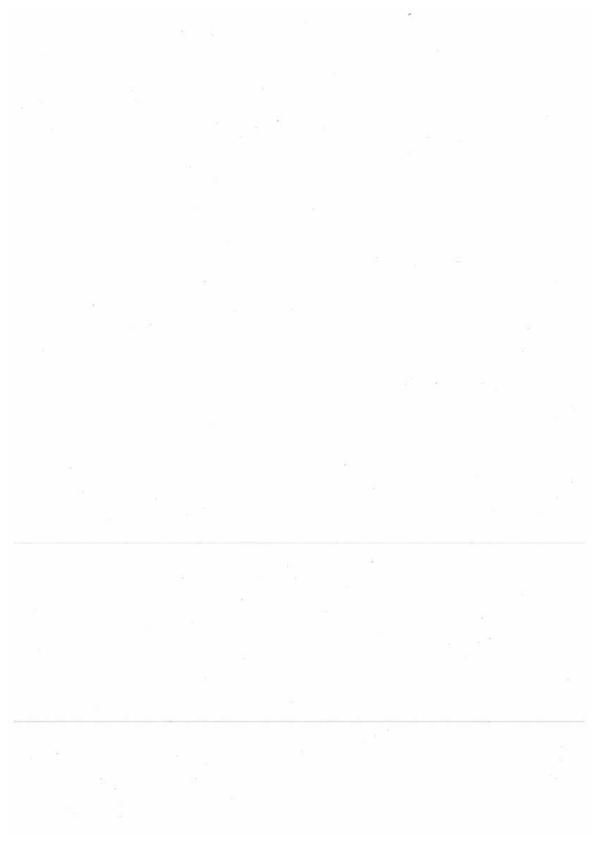
I trust this advice is helpful at this stage and please do not hesitate to contact me if you require any more information or clarification.

Yours sincerely

Graham Broome OD Midlands

Email: Graham.Broome@highwaysengland.co.uk





Picture VII.1

Our Ref. ????

Your Ref

Dealt with by: Dai Larmer
Direct Dial: 0345 129 7777
Date: 30 March 2017

e-mail: dai.larner@highpeak.gov.uk

Andrew Burns
Director of Finance and Resources
1 Staffordshire Place,
Stafford
ST16 2DH

Dear Andy

### County Council-owned Land Suitable for Permanent Traveller use

The Government's national planning policy states that local planning authorities are under a duty to firstly, assess, then fully meet, their traveller pitch requirements (equivalent to a five years' supply). Staffordshire Moorlands District Council currently has a need to provide some additional traveller pitch accommodation. We are formulating a new Local Plan for the District for the period 2016-2031, with the intention of submitting this for independent examination in 2018. The Council must therefore be in a reasonable position to demonstrate to inspector that it can provide a five years' supply of sites by that time.

We have been advised by the Planning Advisory Service to explore all avenues to discover sufficient suitable sites that are deliverable. Unfortunately, after reviewing our own land holdings, the holdings of relevant Government departments, after conducting numerous 'calls for sites' with private landowners; and after having liaised with adjacent planning authorities, Staffordshire Moorlands District Council is still unable to demonstrate any deliverable sites for this purpose.

I would therefore be grateful if you would consider the extent of your Council's own land holdings (including farmholdings) and discuss with me at your earliest convenience whether you would consider releasing any of these for fair consideration. The location of the land would have to be suitable in planning terms although it may not be essential that the site falls within the Staffordshire Moorlands. Of course, this option would be also dependant on the outcome of subsequent discussions with the relevant Local Planning Authority.

I can be contacted on 0345 129 7777 extension 2016 or 07980 847818.

Yours sincerely

# Duty to Co-operate Statement

Dai Larner Executive Director (Place)

2

Picture VII.2

#### HISTORIC ENGLAND NOTE OF MEETING 18/1/2018, MOORLANDS HOUSE, LEEK

#### Present:

Kezia Taylerson

Mark James

Claire Sansom

#### **Agenda Items:**

#### Cheadle Link Road

Explained that at this stage it will be used as an estate road to serve new development and it has been assessed as such in the Heritage Impact Study.

**Action (RW)** – Include the mitigation measures specified for the relevant part of the site within the policy. Use the word appropriate e.g. "appropriate screening mitigation along southern and eastern edge."

#### Re-wording of Policy SS11

**Action (CS)** – split the sentence beginning "Any development should be of a scale and nature......"into 2 sentences to make it clearer. DONE

#### Policy SD2

Advice note regarding renewables will not be completed in the near future.

Agree with Council's suggested inclusion of additional text.

# Policy H4

Historic England originally asked for additional wording in this policy to explain how development causing harm to heritage assets will be expected to be assessed and justified. However, after we pointed out that this is covered in the Historic Environment Policy it was accepted that this is the best place for it.

 $\label{eq:action (DD) - remove reference to heritage harm in this policy.}$ 

#### Policy DC2 - Historic Environment

- H.E. are generally happy with the revised policy but will suggest a few tweaks in a follow up email due by next Wednesday.
- In the supporting text emphasise that the policy requirements apply to all types of development. DONE CS
- Provide details of what would be required in a heritage statement in the supporting text and explain that it is proportionate. DONE CS

#### Action (CS) see above

#### Policy DC1

H.E. happy with addition to policy.

#### **Site Proformas**

**Action (DD & PH)** H.E. happy with addition of Pickwood Rec and Hollybush Inn, Brown Edge into the relevant site proformas.

#### SITES (GENERAL)

Agreed to do the following:

Include <u>specific</u> details of mitigation measures suggested in Landscape, Local Green Space and Heritage Impact Study within the relevant site policy.

Where there is no site policy, include reference in relevant SS policy for that town or larger village.

Action (ALL) When referring to screening use the term 'appropriate screening'.

#### LEEK (DD TO ACTION)

- ADD01 See Heritage Impact Study and give some thought to mitigation (e.g. design features, materials, heights)
- LE150 Add detail from study into policy.
- LE102 See study and work with Gill on this one require more info to check the principle
  of development is acceptable. Check the significance of the site.

# BIDDULPH (CS TO ACTION)

- Review all elements of Wharf Road site identified (BD055, BD071/BD071a, BD106/BD156, BD108) and cover all issues e.g. sensitive design, screening.
- BD108 a bit more complicated as 2 Listed Buildings within the site in this case how does
  the setting contribute to the significance of the assets?

# **CHEADLE (RW TO ACTION)**

- CH132- include screening details in policy.
- CH015 detail how redevelopment of the site can enhance the Conservation Area e.g.
  enhanced frontage, materials, height, scale. (N.B. I don't think there is a policy for this site so
  need to add a reference into the SS policy for Cheadle).
- Mobberley Site see comments under 'Cheadle Link Road'.

# **RURAL (PH TO ACTION)**

- UT019 emphasise sensitive design is required to enhance Conservation Area. (Will have to do this in larger villages SS policy).
- WA004 detail the mitigation measures in larger villages SS policy.

• DSR2 – Include specific mitigation measures in policy to overcome impact.

# SUSTAINABILITY APPRAISAL

Historic England were happy with the responses given previously to the SA issues they raised. They have no further issues to raise.

Picture VII.3

#### James, Mark

From: Davies, David

**Sent:** 27 November 2017 15:04

To: 'swwmplanning@environment-agency.gov.uk'; 'planning.liaison@uuplc.co.uk'

Cc: James, Mark

**Subject:** Staffordshire Moorlands emerging Local Plan : suggested wording for

policies/supporting text SD4 +SD5 [FAO Kazi Hussain / Andrew Leyssens]

Attachments: SMDC Local Plan - suggested policies and supporting text SD4 + SD5.docx

#### Kazi, Andrew

Following your detailed comments to the preferred Options Local Plan 2017 public consultation, I have attempted to integrate your comments into either policies SD4 (Pollution) or SD5 (Flood Risk), or their supporting texts.

I would be grateful if you could review the attachment, and provide feedback. Note <u>red underlined</u> text is new text, text to be deleted is <u>red strikethroughed</u>.

#### Regards

David Davies
Regeneration Officer (Planning Policy)
Staffordshire Moorlands District Council and High Peak Borough Council
Moorlands House
Stockwell Street
Leek
ST13 6HQ
01538 395400 ext 4135

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1

#### Picture VII.4

### James, Mark

From: Hardisty Cheryl (CCG) NSCCG <Cheryl.Hardisty@northstaffsccg.nhs.uk>

 Sent:
 20 March 2017 19:07

 To:
 Wooddisse, Ruth

**Cc:** phil@pjbassociates.com; James, Mark

**Subject:** Re: Staffordshire Moorlands Infrastructure Plan

Thanks, Ruth. Have had that. Was good to meet with you both today and looking forward to working with you both.

Regards Cheryl

Sent from my iPad

On 20 Mar 2017, at 16:26, Wooddisse, Ruth

<Ruth.Wooddisse@staffsmoorlands.gov.uk<mailto:Ruth.Wooddisse@staffsmoorlands.gov.uk<>> wrote:

Cheryl and Phil, good to meet with you both earlier.

I have added your details to our consultation database so you will receive a notification when we hopefully start our Local Plan consultation in June.

The Infrastructure Development Plan - baseline report, which we referred to in the meeting is attached.

Kind regards

Ruth Wooddisse

Regeneration Officer (Planning Policy), Regeneration Services Staffordshire Moorlands District Council & High Peak Borough Council

 $\hbox{\bf E:} \ \underline{ruth.wooddisse@staffsmoorlands.gov.uk < mailto:} \underline{ruth.wooddisse@staffsmoorlands.gov.uk > mailto:} \underline{ruth.wooddisse@staffsmoorlands.gov.uk < mailto:} \underline{ruth.wooddisse.gov.uk < mailto:} \underline{ruth.wooddiss$ 

T: 01538 395400 ext: 4139

www.highpeak.gov.uk<http://www.highpeak.gov.uk/>
www.staffsmoorlands.gov.uk<http://www.staffsmoorlands.gov.uk/>

Working days: Mon - Thurs

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# Duty to Co-operate Statement

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<Staffordshire Moorlands IDP Baseline Report.pdf>

2



My Ref

Your Ref

Richard Lawrence Head of Development Stafford Borough Council Civic Centre Riverside Stafford ST16 3AQ

8 February 2018

Dear Richard

#### Staffordshire Moorlands Local Plan

You will be aware that Staffordshire Moorlands District Council is in the process of preparing a new Local Plan which will supersede its adopted Core Strategy and include site allocations. The Council is scheduled to publish the Local Plan on 27<sup>th</sup> February and submit to the Secretary of State by the end of June 2018.

Officers from our respective Council's along with colleagues from Stoke-on Trent City Council and Newcastle Borough Council have met on a regular basis during the preparation of the plan in order to consider emerging evidence, proposals and associated implications. This has included the consideration of development requirements across the respective areas and the possible implications of the proposed strategic mixed-use development site at Blythe Vale.

I understand that officers have also agreed that there would be some merit in the preparation of a Statement of Common Ground between the four authorities which, subject to Councillor approval, would establish the strategic matters upon which the Councils are required to consider under the Duty to Co-operate, outcomes and provisions for ongoing co-operation. This would be underpinned by evidence which indicates that Staffordshire Moorlands, Stafford Borough, Stoke-on-Trent and Newcastle is an appropriate geographic area within which to co-operate on strategic matters. This would be in line with the Government's emerging proposals to improve the operation of the Duty to Co-operate as set out in the "Planning for the right homes in the right places" consultation document issued by the Department for Communities and Local Government in September 2017.

Given the timescales for the submission of our Local Plan, we would welcome your support in preparing and agreeing a Statement of Common Ground before the end of June. A draft Statement of Common Ground has been prepared and is under active discussion by officers. In support of this work, I would welcome your consideration of two key matters that have been discussed by officers:







1. Meeting the full objectively assessed need for housing in Staffordshire Moorlands

The Staffordshire Moorlands Strategic Housing Market assessment (SHMA) published in 2014 identified that the District is not a fully self-contained Housing Market Area but that it shared relations with other authorities within the wider Stoke-on-Trent Strategic HMA. The SHMA has since been updated to take account of new household and jobs growth projections. The latest objective assessment for housing for the District published in 2017 concluded that there is a need for 235 to 330 homes per year up to the year 2031. The bottom end of this range relates to demographic factors whilst the upper end would support economic growth. The Local Plan proposes an annual average housing requirement of 320 homes per year. Whilst the plan period is 2016 to 2031, the net housing requirement for the District in the Local Plan seeks to take account of the backlog of housing since 2012. Accordingly, over the nineteen period from 2012 to 2031, there is a deficit of 190 planned homes when compared to the top end of the objectively assessed need for housing. This is in spite of an agreement with the Peak District National Park Authority to make an allowance for 100 homes towards the Staffordshire Moorlands Local Plan housing requirement to take account of projected completions within the parts of the National Park which lie within the District.

The Council has been unable to make provisions for 330 homes per year due to the constrained supply of suitable land within the District. This is limited by factors including the Peak District National Park and Green Belt which combined cover a significant area of the District. Some Green Belt release is proposed in the Local Plan, particularly in Biddulph where the need for a comprehensive Green Belt Review was acknowledged by the Inspector who considered our Core Strategy.

Nevertheless, we are mindful of the need to protect the Green Belt and to meet the full objectively assessed need for housing. Given our planned level of housing provision and reliance upon Green Belt release, I would be grateful if you were able to consider the scope to accommodate some, or all, of the identified shortfall in housing provision within Stafford Borough.

Meeting the full objectively assessed need for accommodation for gypsies and travellers

The need for sites for gypsies and travellers within District has been identified through the Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015).

The assessment identified a requirement for six residential pitches for the District over the period 2014 – 2019 with an additional two residential pitches up to 2034. However, in spite of the consideration of numerous site options and a call for sites, the Council has been unable to identify a site which is both suitable and available. The search has included consideration of land in public ownership, including that owned by both the District Council and Staffordshire County Council. As such, the Local Plan does not identify where the need for pitches will be met and is reliant upon a criteria based policy to consider potential future windfall sites.







Simon W. Baker B.Ed MBA MIMSPA

Chief Executive

Accordingly, I would welcome your consideration of the scope for our unmet needs for pitches to be met in full, or in part, within Stafford Borough.

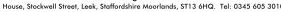
I trust that the outcome of your deliberations on these matters will be valuable to the emerging Statement of Common Ground and I look forward to continued co-operation as our plans move forward.

Yours sincerely,

Dai Larner

Executive Director - Place Staffordshire Moorlands District Council









My Ref

Your Ref

Harmesh Jassal Strategic Manager Planning, Policy and Building Regulations Stoke-on-Trent City Council Civic Centre Glebe Street Stoke-on-Trent ST4 1HH

8 February 2018

Dear Harmesh

## Staffordshire Moorlands Local Plan

You will be aware that Staffordshire Moorlands District Council is in the process of preparing a new Local Plan which will supersede its adopted Core Strategy and include site allocations. The Council is scheduled to publish the Local Plan on 27<sup>th</sup> February and submit to the Secretary of State by the end of June 2018.

Officers from our respective Council's along with colleagues from Stafford Borough Council and Newcastle Borough Council have met on a regular basis during the preparation of the plan in order to consider emerging evidence, proposals and associated implications. This has included the consideration of development requirements across the respective areas and the possible implications of the proposed strategic mixed-use development site at Blythe Vale.

I understand that officers have also agreed that there would be some merit in the preparation of a Statement of Common Ground between the four authorities which, subject to Councillor approval, would establish the strategic matters upon which the Councils are required to consider under the Duty to Co-operate, outcomes and provisions for ongoing co-operation. This would be underpinned by evidence which indicates that Staffordshire Moorlands, Stafford Borough, Stoke-on-Trent and Newcastle is an appropriate geographic area within which to co-operate on strategic matters. This would be in line with the Government's emerging proposals to improve the operation of the Duty to Co-operate as set out in the "Planning for the right homes in the right places" consultation document issued by the Department for Communities and Local Government in September 2017.

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The Staffordshire Moorlands SHMA has since been updated to take account of new household and jobs growth projections. The latest objective assessment for housing for the District published in 2017 concluded that there is a need for 235 to 330 homes per year up to the year 2031. The bottom end of this range relates to demographic factors whilst the upper end would support economic growth. The Local Plan proposes an annual average housing requirement of 320 homes per year. Whilst the plan period is 2016 to 2031, the net housing requirement for the District in the Local Plan seeks to take account of the backlog of housing since 2012. Accordingly, over the nineteen period from 2012 to 2031, there is a deficit of 190 planned homes when compared to the top end of the objectively assessed need for housing. This is in spite of an agreement with the Peak District National Park Authority to make an allowance for 100 homes towards the Staffordshire Moorlands Local Plan housing requirement to take account of projected completions within the parts of the National Park which lie within the District.

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Nevertheless, we are mindful of the need to protect the Green Belt and to meet the full objectively assessed need for housing. Given our planned level of housing provision and reliance upon Green Belt release, I would be grateful if you were able to consider the scope to accommodate some, or all, of the identified shortfall in housing provision within Stoke-on-Trent. This request is in addition to our previous correspondence regarding the scope for you to accommodate housing within your boundaries on the periphery of Biddulph.

Meeting the full objectively assessed need for accommodation for gypsies and travellers.

The need for sites for gypsies and travellers within District has been identified through the Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015).

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for pitches will be met and is reliant upon a criteria based policy to consider potential future windfall sites.

Accordingly, I would welcome your consideration of the scope for our unmet needs for pitches to be met in full, or in part, within Stoke-on-Trent.

I trust that the outcome of your deliberations on these matters will be valuable to the emerging Statement of Common Ground and I look forward to continued co-operation as our plans move forward.

Yours sincerely,

Dai Larner

Executive Director - Place Staffordshire Moorlands District Council



www.staffsmoorlands.gov.uk Moorlands House, Stockwell Street, Leek, Staffordshire Moorlands, ST13 6HQ. Tel: 0345 605 3010. All correspondence to Staffordshire Moorlands District Council, P O Box 136, Buxton, SK17 1AQ.





My Ref

Your Ref

Neale Clifton
Executive Director – Regeneration and Development
Newcastle-under-Lyme Borough Council
Civic Offices
Merrial Street
Newcastle-under-Lyme
Staffs
ST5 2AG

8 February 2018

Dear Neale,

#### Staffordshire Moorlands Local Plan

You will be aware that Staffordshire Moorlands District Council is in the process of preparing a new Local Plan which will supersede its adopted Core Strategy and include site allocations. The Council is scheduled to publish the Local Plan on 27<sup>th</sup> February and submit to the Secretary of State by the end of June 2018.

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Nevertheless, we are mindful of the need to protect the Green Belt and to meet the full objectively assessed need for housing. Given our planned level of housing provision and reliance upon Green Belt release, I would be grateful if you were able to consider the scope to accommodate some, or all, of the identified shortfall in housing provision within Newcastle-under-Lyme Borough. This request is in addition to our previous correspondence regarding the scope for you to accommodate housing within your boundaries on the periphery of Biddulph.

Meeting the full objectively assessed need for accommodation for gypsies and travellers.

The need for sites for gypsies and travellers within District has been identified through the Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015).

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for pitches will be met and is reliant upon a criteria based policy to consider potential future windfall sites.

Accordingly, I would welcome your consideration of the scope for our unmet needs for pitches to be met in full, or in part, within Newcastle-under-Lyme Borough.

I trust that the outcome of your deliberations on these matters will be valuable to the emerging Statement of Common Ground and I look forward to continued co-operation as our plans move forward.

Yours sincerely,

Dai Larner

Executive Director - Place Staffordshire Moorlands District Council









Our ref: Your ref: Date: 16<sup>th</sup> April 2018

Dai Larner
Executive Director – Place
Staffordshire Moorlands District Council
By email only to Dai.Larner@staffsmoorlands.gov.uk

Dear Mr Larner,

#### Staffordshire Moorlands Local Plan

Thank you for your letter dated 8 February, 2018, addressed to Neale Clifton, Executive Director, Regeneration and Development, regarding the preparation of new Staffordshire Moorlands Local Plan. I have been asked to prepare a reply on Neale's behalf.

As you have stated officers from Newcastle-under-Lyme Borough Council have regularly met with your officers together with colleagues from Stoke-on-Trent City Council and Stafford Borough Council to consider and discuss the plan's evidence base, proposals and associated cross boundary implications. The Borough Council is committed to continuing this dialogue and cooperating in the preparation of a Statement of Common Ground. As you aware the Council's Planning Policy Officers have already begun to input into this with a view to gaining the approval to a Final Statement at the Council's Cabinet meeting in June 2018.

In the meantime and in response to the key points within your letter I can advise the following:

## 1. Meeting the full objectively assessed need for housing in Staffordshire Moorlands

Officers have considered the request for Newcastle-under-Lyme Borough Council to accommodate some, or all, of Staffordshire Moorland's identified shortfall in housing provision within the borough and can confirm that the Council is not in a position to accommodate any of the anticipated housing shortfall. This in part reflects the fact that Newcastle-Borough Council are in the early stages of preparing a new Local Plan in partnership with Stoke-on-City Council, including gathering evidence in respect of the housing needs and land supply, across the housing market area (HMA), which both authorities share. It is considered the Joint Local Plan will need to be at a more advanced stage before the Borough Council would be in a position to consider the needs of any other adjoining authorities. However, the recently published Preferred Options Consultation Document has identified that Newcastle-under-Lyme is currently unable to accommodate its apportionment of the HMA's Objectively Assessed Need, resulting in a shortfall across the plan area as a whole. Therefore at this current time Newcastle-under-Lyme Borough Council is unable to assist in meeting any of the housing shortfall within the Staffordshire Moorlands.

2. Meeting the full objectively assessed need for accommodation for gypsies and travellers

We have also considered the request for Newcastle-under-Lyme Borough Council to accommodate some, or all, of the unmet needs for gypsy and traveller pitches arising from Staffordshire Moorlands within Newcastle-under-Lyme and as stated above suggest that the Joint Local Plan will need to be at a more advanced stage before the Borough Council would be in a position to consider the needs of any other adjoining authorities.

Furthermore, Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council have cooperated on the preparation of a Joint methodology to identify the provision of pitches. Preparations are underway to consult on the Joint methodology and potential land to accommodate the requirement later in 2018. Therefore, at this stage the Borough Council is not in a position to identify suitable and/or available land within Newcastle-under-Lyme to accommodate its needs, or the needs of other local authorities. However, a shortfall of housing and employment land within Newcastle-under-Lyme means that the Borough Council is unlikely to be able accommodate any potentially arising unmet gypsy and traveller needs from neighbouring authorities due to a lack of available land.

Newcastle-under-Lyme Borough Council continues to welcome the opportunity to engage in Duty to Cooperate discussions with Staffordshire Moorlands District Council and trusts that in this respect this letter is helpful.

Yours sincerely

**Guy Benson** 

Head of Planning

Guy R. Benson

Directorate of Regeneration and Development

Email guy.benson@newcastle-staffs.gov.uk

Direct fax 01782 714303

Date: 01 June 2016 Our ref: 185639

Your ref: LP00045\_StaffsMoors\_HRA\_2\_120516.docx

Vicky Pearson ClearLead Consulting Limited (on behalf of Staffordshire Moorlands District Council)

BY EMAIL ONLY



Customer Services Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Vicky

## Planning consultation: Staffordshire Moorlands Local Plan HRA

Thank you for your consultation on the above dated 12 May 2015 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

## The Conservation of Habitats and Species Regulations (as amended) 2010

Natural England welcomes your initial screening letter and report. With regard to the questions posed at the end of your letter Natural England would like to be consulted at the preferred options stage, as proposed in section 3.4 of your letter. We confirm that we are satisfied with the summary of your proposed approach to HRA screening of the Local Plan subject to the following observations:

We welcome your proposal to expand the HRA screening 'narrative' (reference section 3.1 of your letter). That narrative should ensure that a clear explanation is provided for those sites screened out of the HRA process at the 'initial sift' stage e.g. to demonstrate the lack of a linkage or 'pathway' between the plan's policies/allocations/proposals and the European designated sites in question.

In terms of the information sources listed at section 3.1 you may also wish to refer to the APIS (Air Pollution Information System) website<sup>1</sup>. This includes information on 'site relevant critical loads' which helps to illustrate the current air quality status of individual designated sites and offers valuable contextual information alongside the Natura 2000 sites' 'conservation objectives'.

<sup>1</sup> http://www.apis.ac.uk/

We agree with the list of N2k sites identified at section 2.2 for further HRA work at this stage.

With regard to the Cannock Chase SAC I enclose a weblink<sup>2</sup> to Stafford Borough's planning document 'Cannock Chase SAC – guidance to mitigate the impact of residential development'. This describes the current approach to mitigation of recreation impacts arising from new dwellings in that borough. Very similar guidance documents have been produced by Lichfield and South Staffordshire District Councils. In particular the guidance indicates the approach that is being taken with regard to housing within the 0-8Km and 8-15Km of the SAC.

Regarding 'uncertainty' we would encourage the use of robust scientific evidence in all HRAs. Where direct and detailed evidence is lacking a plan level HRA should seek to address this by gathering relevant evidence to identify trends. It may be necessary to undertake modelling , seek expert opinion or to commission new research and/or survey work.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter <u>only</u> please contact me on 0208 026 0939. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller Lead Adviser – Sustainable Development and Wildlife Team – North Mercia Area

 $\label{lem:http://www.staffordbc.gov.uk/live/Documents/Planning%20Policy/Further%20Information%20and%20Evidence/Habitats%20Regulation%20Assessment/Cannock-Chase-SAC-Finanicl-Contributions.pdf$ 

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<sup>&</sup>lt;sup>2</sup> Weblink