

## STAFFORDSHIRE MOORLANDS LOCAL PLAN EXAMINATION

### INSPECTOR'S PRELIMINARY VIEWS ON MATTERS AND ISSUES FOR THE EXAMINATION INCLUDING SOME INITIAL QUESTIONS AND COMMENTS

#### Introduction

1. The purpose of this note is to:
  - set out my views on potential matters and issues for the examination and;
  - seek clarification from the Council on a number of points relating to those matters and issues.
2. These views and questions arise from my initial reading of the Local Plan (LP) and some of the key supporting documents including the Summary of Representations (Table 3.1 within Evidence Document (ED5.3)).
3. The answers will help me to draw up 'Matters and Issues' for the examination hearings. I may have further questions during the preparation period which are not covered in this note. My questions and comments are without prejudice to consideration of the soundness of the Plan's policies during the remainder of the Examination, including at the hearings. **Some of the answers to the points that I raise may be contained within the evidence base. If that is the case please could my attention be drawn to where I can find the information?**
4. Not all matters raised go to soundness but may assist with the clarity of the LP. Where a point could potentially be addressed by a Main Modification (MM) or Additional Modification (AM) to the LP I will make this clear by including **MM** or **AM** in the text.
5. All references to paragraphs and policies relate to the 'Staffordshire Moorlands Local Plan Submission Version February 2018' (ED1.1).

#### Preliminary Points

6. The Submission Version of the LP was subject to consultation between February and April 2018. This is the version of the LP which is the starting point for the examination. The proposed changes made after the consultation that are included in the Schedule of Additional Modifications (ED1.2) will also be considered during the examination. However, it appears that most of the changes do not go to 'soundness' and would therefore form the basis of AMs suggested by the Council during the examination. If any of the changes made do go to 'soundness' they would be included in the Schedule of MMs (see below). I will advise you in due course if I think that this is the case.
7. The AMs would be distinct from any further changes to the submitted LP which arise during the examination and are required to make the LP 'sound' which will comprise MMs. Assuming that any are necessary a Schedule of MMs should be produced during the examination which should be a living document to be updated and included on the website. After the hearing sessions it will be necessary to consult on any MMs and consider any implications for the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). To ensure that the number of MMs does not

become unwieldy all proposed changes to a particular policy and consequential changes to its explanation should be encompassed within a single MM.

8. Hearing sessions forming part of the examination are likely to take place over a period of around 2 weeks. The weeks commencing 8 and 15 October appear to be the most suitable for the hearings. I understand that accommodation is available for most of that period. Six weeks' notice is required for the hearings i.e. by 27 August 2018. However, in view of the Bank Holiday formal notice should be given no later than Friday 24 August 2018.
9. I would envisage that strategic matters such as the duty to cooperate, statutory compliance, housing and economic development needs and the overall strategy would be dealt with during the first week. The first week would also accommodate discussions on the components of housing supply and whether these would be sufficient to meet the housing requirement over both the plan period and the next 5 years. Then site allocations, infrastructure and implementation and monitoring would be dealt with in the second week. A review session would then take place a few days later.
10. I set out an indicative programme for the hearings in **Appendix 1** based on the potential Matters and Issues and representations. Feedback on this programme would be welcome, particularly whether too much or too little time has been allocated to various sessions, having regard to the level and nature of representations.
11. The Government published a new National Planning Policy Framework (Framework/NPPF) on 24 July 2018. However, para 214 advises that policies in the previous NPPF will apply for the purpose of examining Local Plans submitted on or before 24 January 2019. In this respect the implications of the new Framework for this examination are limited. Therefore, for the avoidance of doubt I have based the paragraph references within this note on the 2012 Framework on the basis that it these policies that are relevant.

### **Matter 1 – Legal Compliance, Procedural Requirements and the Duty to Cooperate (DTC)**

12. Issues that are likely to be discussed at the hearing session are:
  - The extent and type of consultation and community engagement;
  - The SA and HRA;
  - The timeframe of the LP and its relationship to the evidence base;
  - The DTC and in particular addressing housing needs in the Housing Market Area (HMA) and dealing with infrastructure constraints, particularly transport.
13. The Strategic Housing Market Assessment (SHMA) Update of 2017 indicated that Staffordshire Moorlands must consider the housing issues of adjoining authorities, particularly Stoke-on-Trent (para 8.3). However, it is noted from the Duty to Cooperate Statement (ED9.2) and the LP itself that it is not the intention of Staffordshire Moorlands to meet housing needs from elsewhere. It is suggested that Green Belt and National Park constraints prevent that. However, about 50% of the District (excluding the PDNP) lies outside the Green Belt. What is the up to date

position in terms of unmet needs of the wider HMA?

14. Paragraph 1.22 refers to areas where Neighbourhood Plans are currently being prepared. What stage have the Neighbourhood Plans reached? Are they delivering, as a minimum, the housing and employment requirements set out in Policy SS4?
15. I note that Supplementary Planning Documents (SPDs) have or are to be prepared (Design Guide, Developer Contributions, Open Space/Sport/Recreation). It would be helpful to make reference to these within Chapter 1 (**AM**).
16. The Council in the Policy Topic Paper (ED13.5) indicate that regard has been had to the Court of Justice of the European Union – People over Wind, Peter Sweetman v Coillte Teoranta (Case C-323/17) and that the HRA is legally compliant. Has legal advice been taken to inform this view?

## **Matter 2 – Strategy and Strategic Policies**

17. Issues that are likely to be discussed at the hearing session are:
  - The spatial distribution of development, including the changes for Cheadle and the Rural Areas compared to the Core Strategy (CS);
  - The settlement hierarchy in Policy SS2, including the position of settlements in the hierarchy;
  - The terms of Policies SS1 and SS1a;
  - Green Belt –whether exceptional circumstances have been demonstrated for the alteration of Green Belt boundaries (Green Belt alterations will also be discussed in relation to specific allocations during Week 2);
  - The approach to settlement boundaries, development adjoining boundaries and infill development in villages and rural areas (Policies SS2, SS8, SS9 and H1).
18. There is no need to reiterate policies set out in the Framework<sup>1</sup>. Policy SS1a does this and could potentially be deleted (**MM**). Other policies do likewise (see below). In attempting to repeat national policy there is a danger that some inconsistencies will creep in and lead to small but critical differences between national and local policy and difficulties in interpretation and relative weighting. Moreover, national policy has changed with the revised Framework.
19. The Framework indicates that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the LP. The LP seeks the alteration of Green Belt boundaries (paras 7.48, 9.53, 9.81, 9.120 and 9.123 refer) but there is insufficient justification by reference to exceptional circumstances. Whilst it may well be evidenced in supporting documents such as the Green Belt Review such justification should be included in the LP, should it have been demonstrated (**MM**). In this respect I would suggest higher level strategic justification for exceptional circumstances is provided in Chapter 7 with more detailed justification provided alongside specific Green Belt releases in Chapter 9. Reference should be made to the factors referred to in paragraphs 83 - 85 of the NPPF.

---

<sup>1</sup> NPPG (Paragraph: 010 Reference ID: 12-010-20140306)

20. The settlement hierarchy within Policy SS2 includes Rural Area Smaller Villages. Some of these lie within the Green Belt. Is there a need to distinguish between the level and type of development that would be allowed in those smaller villages in the Green Belt compared to those beyond the Green Belt? **(MM)** Moreover the term 'unacceptable' would be preferable to 'inappropriate' in this section of Policy SS2 as the latter is normally used in referring to solely Green Belt development **(AM)**.
21. The explanation to Policy SS9 indicates that those smaller villages excluded from the Green Belt have retained their settlement boundaries. However, this does not appear to be reflected in the Policies Maps for the relevant villages e.g. Bagnall, Caverswall and Cookshill, Kingsley Holt and Stanley, where the indication is that the 1998 Local Plan Village Boundary is to be removed. What is the intention of the LP in this respect?
22. Part 4 of Policy H1 sets out that within the Development Boundaries of the Towns and Larger Villages, residential development will be permitted. It then sets out that 'limited infill' residential development of an appropriate scale and character for the Spatial Strategy will be supported where it will adjoin the boundary of a Larger Village and be well related to the existing pattern of development and surrounding land uses. 'Limited infill' does not appear to be defined anywhere in the plan and it is unclear why the proposed approach only applies to the Larger Villages when the Towns also have defined Development Boundaries. Part 4 should also be qualified in relation to the Green Belt. Modifications should be proposed to address these matters **(MM)**.
23. Large brownfield sites at Froghall and Blackshaw Moor are referred to in Policy SS10. I am assuming that potential employment and residential development at Froghall has not been included within housing land supply (Policy SS4) because of delivery issues. Is Blackshaw Moor taken into account as a commitment as it has planning permission?
24. With regard to the Bolton Copperworks site at Froghall, although Policy SS10 and the explanation makes reference to the site, potential uses, the SPD and a Masterplan, and the 'regeneration opportunity' is shown on the Policies Maps, there is no separate policy for the site in Chapter 9. As a major regeneration opportunity does it not warrant a separate policy, particularly in comparison with some smaller sites which have the benefit of a separate policy **(MM)**?
25. Para 1.2 states that '*strategic policies are those which are essential to delivering the overall planning and development strategy for the District, such as those that set out the number of homes that should be built*'. Para 7.19 also notes that Policy SS2 is a strategic policy that Neighbourhood Plans must be in general conformity with. It may be helpful for NPs if the LP was more precise about which policies were considered to be strategic in this context **(AM)**.

### **Matter 3 - Housing and Employment Objectively Assessed Needs (OAN) and Requirements**

26. Issues that are likely to be discussed at the hearing session are:

- Whether the evidence base supports the housing requirement of 320 dwellings per annum (dpa) or 6080 dwellings for the LP period within an OAN range of 235 to 330 dpa taking into account demographic and economic factors, market signals and affordable housing need;
  - The need for 27 ha of employment land;
  - The relationship between housing and employment land provision.
27. There is a lack of clarity in respect of the overall housing target. Para 7.20 sets out that the SHMA Update concluded that the housing need of the District was within the range of 235 to 330 additional homes per year up to 2031. Para 8.2 of the SHMA states: *'Taking into account the scenarios tested and the core constraints on development delivery as shown by current evidence, it is NLP's recommendation that the housing OAN range for Staffordshire Moorlands is between 235 and 330 dpa. It provides a realistic level of housing provision which will address economic growth requirements, affordable housing need, worsening market signals and the demographic challenges that are present'*.
28. In comparison the identified need differs from the 250-440 dpa range in the January 2016 SHMA update. Para 1.4 of the Plan states the Core Strategy identified a target of 300 dwellings per year for 2006-26. This was the annual average over that period. Policy SS2 of the Core Strategy had a stepped/backloaded development rate of 220dpa for 2016-16, 360dpa for 2016-21 and 400dpa for 2021-26 – 6,000 dwellings in total for 2006-26. The Government's proposed new formula for assessing housing need is 193 for the District over the period 2016 to 2026.
29. The LP explains that the top of the range relates to the level of housing required to support potential employment growth, whilst the bottom reflects household projections. The latter would lead to a decline in the number of jobs in the District due to a decline in the working age population. Para 7.22 goes on to state that in order to address the OAN the plan proposes 6,080 dwellings for the period 2012 – 2031 (an annual average of 320 dwellings per year over the 19 year period). It goes on to explain that although the Local Plan period is 2016 to 2031, *'the calculation of housing requirements backdates to 2012 in order to take account of the shortfall of housing provision that has occurred in recent years'*.
30. It therefore appears the Council are somehow combining the arising identified need with an allowance for under-delivery from the Core Strategy. The precise mechanics of what the Council are proposing here is unclear but it is peculiar for the requirement to relate to years that are outside of the plan period as it is normal practice to align the housing requirement with the Plan period. Any 'backlog' in provision before the LP period would be captured by the analysis of OAN and unmet housing needs in the Strategic Housing Market Assessment (SHMA). This is in contrast to shortfalls which occur after the base date of the LP which form part of the housing requirement and are included in the housing supply figures (see Matter 4 below). What are the reasons for this departure from normal practice? What would be the implications for the OAN and LP if the housing requirement and Plan period were aligned so that both related to the period 2016-2031? Ideally the arising housing need during the plan period and any allowance for previous under-delivery from the Core Strategy should be distinguishable and clearly set out.

31. The earlier under-delivery is discussed at paras 4.23 to 4.30 of the 2017 SHMA update but it remains unclear as to what allowance the Council are making for this in the plan. The SHMA notes the delivery for 2011/12 to 2015/2016 was only 622 dwellings (71 + 96 + 78 + 278 + 99 = 622). Given the target in the Core Strategy was 220 dwellings per annum for the 2006 to 2016 period, it calculates the under-delivery for the five year period was 478 dwellings. It also calculates an under-delivery figure of 798 dwellings assessed against the Core Strategy overall average target of 300dpa - 1,500 for the five year period. However, the calculation in the SHMA is incorrect. Instead of 798 dwellings, it should refer to an under-delivery of 878 dwellings.
32. A further concern is the housing need identified in the SHMA and the employment land provision calculations appear to be linked. Para 7.26 explains that the SHMA and the 2014 Employment Land Study (updated in 2017) *‘have been co-ordinated and based on common data and scenarios in order to better understand the relationship between housing and employment and to support an appropriate balance of development. The 2017 report identified a need for 13 to 27 hectares of employment land across the District to 2031. In order to provide a balanced level of employment and housing, the employment land requirement of 27 hectares is proposed. As with the housing requirement, this level of development is towards the top of the range of identified needs and will help to support the growth of around 800 FTE jobs’.*
33. However, the 27ha employment land requirement is not *‘towards the top’*, it is at the top of the identified range. Does this therefore suggest, in the interest of balanced housing/employment provision, that the top of the SHMA housing range should also be used in the plan? (i.e. 330 dwellings per annum)
34. It is also unclear why page 50 of the 2017 Employment Land Study Update refers to the identified 13ha – 27ha range as being over the 2014-2031 period but Table 7.4 on page 53 of the plan identifies the 27ha requirement as being over the 2012 to 2031 period. In this regard, paragraph 7.35 simply states that *‘a start date of 2012 has been used for commitments to synchronise with that of housing requirements above.’*
35. The second paragraph of Policy SS3 is inappropriately worded. It states, *‘The Council will review the annual development rate...’*. This implies the annual target will be regularly adjusted and not necessarily through a review of the plan. It should perhaps say the Council will *‘monitor’* the situation and manage the housing supply to ensure the *‘delivery’* of the annual rate, as suggested at the end of para 7.29 and in Policy SS4 (MM).

#### **Matter 4 –Housing Land Supply**

36. Issues that are likely to be discussed at the hearing session are:
- The components of housing supply to meet the housing requirement;
  - Flexibility and/or a slippage allowance;
  - The method of addressing shortfall – Sedgefield or Liverpool method;
  - 5% or 20% buffer;
  - The windfall allowance;

- The contribution from the Peak District National Park (PDNP);
  - Potential provision in the settlements compared to housing requirements (Policy SS4);
  - The housing trajectory;
  - The need for a Housing Implementation Strategy (HIS);
  - The base date for housing supply calculations.
37. The housing trajectory in Appendix 7 indicates that delivery fell as low as 78 dwellings in 2013/14 and is expected to rise as high as 669 dwellings in 2022/23. The latter is over twice the annual requirement of 320 dpa. The realism of this level of delivery will be explored at the hearings.
38. It is also unclear why the Council have moved away from the staged/phased housing target used in the Core Strategy which effectively back-loaded the housing requirement towards the end of the plan period. By taking the annual average for the whole plan period approach in the Local Plan, is the Council quickly going to face 5 year housing land supply/housing delivery issues that could undermine the plan led approach?
39. Policy SS4 in setting out the need to provide additional dwellings should refer to 'at least 3859 additional dwellings'. The policy would then be consistent with Policy SS3. The policy refers to land being 'identified' although as elements of the provision are windfalls all provision is not technically identified. The 2<sup>nd</sup> para of the policy refers to a windfall allowance for small sites although a large windfall site allowance is also included for Leek and Biddulph. Para 7.29 (2<sup>nd</sup> sentence) refers to how the housing requirement will be met but does not mention windfalls. The wording of Policy SS4 and the explanation should be amended accordingly **(MM)**.
40. In terms of Leek there is a shortfall in potential provision (980) against the net housing requirement (1015). Whilst elsewhere there is a potential modest surplus (Biddulph and Rural) it would seem preferable to ensure that the net housing requirement for each area is met as a bare minimum. Indeed additional provision or a slippage allowance (as with the CS) against the net housing requirement would be preferable to build some flexibility into supply against the requirement. In what ways does the approach to monitoring and housing supply make this unnecessary (para 7.34 refers)? If considered necessary in what way could additional flexibility be built into housing supply?
41. Policy SS4 also deals with neighbourhood plans and the net housing requirement. Should this also be expressed as a minimum? **(MM)** For Biddulph there is inconsistency between the net housing requirement (885), the potential provision (890) and the neighbourhood plan requirement (905). Should the first and third figures be consistent or is the difference accounted for by the inclusion of Biddulph Moor in the neighbourhood plan area?
42. Paragraph 47 of the Framework expects LPAs to illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a Housing Implementation Strategy (HIS) so that a five year supply can be maintained through the LP period. A trajectory is included in Appendix 7. How is a HIS to be set

out? (MM)

43. In relation to the base date for housing supply figures the information appears to be available to use 31 March 2018 to inform the hearing discussions (see ED19.1 and 19.2). This base date and the relevant figures could then be incorporated into Tables 7.2 and 7.3 and included in the adopted version of the LP. There would also be implications for the figures within Policy SS4 and the trajectory at Appendix 7 (MM).
44. The LP should also clearly express the key assumptions and parameters which will be relied upon to calculate the 5 year housing land supply upon adoption of the LP. Therefore, para 7.24 should refer to the method of addressing the shortfall since the start of the LP period (be it Sedgefield or Liverpool) but also the buffer to be applied (5% or 20%). (MM) The Housing Supply Assessment (ED19.1) explains the Council's position (Liverpool and 20%). These matters will be discussed at the relevant hearing session.
45. The Framework refers to local planning authorities setting out an approach to housing density to reflect local circumstances. Is there a case for seeking higher density development on sites that are well-connected to boost supply?

#### **Matter 5 – Specific Housing Needs and Generic Housing Policies**

46. Issues that are likely to be discussed at the hearing session are:
- The effectiveness of Policy H1 in meeting the need for a mix dwellings;
  - The justification for applying the Nationally Described Space Standard and the Optional Building Regulation requirement for accessibility, if that is what is intended;
  - The need for and policies relating to Self-Build/Custom Build Housing;
  - The justification for affordable housing targets and the tenure split in Policy H3, taking into account considerations such as viability;
  - Whether provision should be made for a proportion of market housing on rural exception sites;
  - Whether there is a need to make allocation(s) for gypsies and travellers pitches (residential) taking into account the Gypsy and Traveller Accommodation Assessment (GTAA) and other evidence;
  - The terms of Policy H4 (Gypsy and Traveller Sites and Sites for Travelling Showpeople).
47. Policy H1 does not include any provisions for Starter Homes despite the box under the policy suggesting that the policy has been amended to 'promote the supply of starter homes.' It is noted that Policies SS1 and SS6 also refer to starter homes but not the other Area Strategy policies. Is there a distinction between Biddulph and the other areas of the district in terms of the need for starter homes?
48. Policy H1 refers to housing proposals of 10 dwellings or more providing a mix of housing in terms of size, type and tenure. However, Policy H3 only requires affordable housing on developments of 15 dwellings or more. Both are different to

the threshold in the PPG (11)<sup>2</sup> (see below for further commentary on Policy H3).

49. Paras 1.30 and 8.51 refer to Self-Build Housing and the low level of interest. The Policy Topic Paper (ED13.5) refers to the number of registrations. Is this level of interest sufficient to trigger a requirement under Policy H1?
50. It is unclear from para 8.50 and part 3d) of Policy H1 whether the Council are formally adopting the optional national technical standards in relation to space and accessibility. The wording is rather vague by using phrases such as 'aim to provide' and 'seeking to achieve'. If the Council are proposing to adopt the standards, the Planning Practice Guidance (PPG) in relation to demonstrating need and viability is relevant<sup>3</sup>. In contrast, the end of paragraph 8.13 recognises the obligation to demonstrate a clear need before adopting the optional tighter water efficiency standards and in the absence of such evidence Policy SD3 simply states the Council will 'support' any proposed measures which go beyond the minimum requirements. If the intention is to apply the optional standards then the necessary evidence should be provided and Policy H1 made explicit in this regard **(MM)**.
51. Policy H3 has a 15 dwelling (0.5ha) threshold for the towns and 5 dwelling (0.16ha) threshold for 'elsewhere'. The target in both cases is 33% affordable housing provision. The 'elsewhere' threshold does not appear to accord with the PPG on Planning Obligations which sets out that obligations should not be sought from developments of 10 units or less and which have a maximum combined floorspace of no more than 1,000 square meters (gross internal area)<sup>4</sup>. The PPG notes that in 'designated rural areas' LPAs may choose to apply a lower threshold of 5 units or less. However, the LP does not confirm that the District is 'an area designated by order of the Secretary of State as a rural area'. What is the position?
52. Given para 8.56 of the plan states the SHMA findings would suggest a 100% affordable housing target, why has the Council not adopted the minimum 11 dwelling threshold that the PPG enables? In terms of the 33% the Viability Study (ED24.1) suggests a range of 10% to 33% affordable housing depending on location. Is there not a case for a finer grain requirement? If the level set was that supported by viability evidence then the wording of Policy H3 could be more prescriptive and provide more certainty. As it stands the wording of Part 1) a) (2<sup>nd</sup> sentence) and Part 1) b) in allowing negotiation in each case is likely to undermine the provision of affordable housing.
53. In addition should the provision of a commuted sum exceptionally apply to both parts 1) a) and 1) b) of Policy H3?
54. Part 2a) of the Policy enables rural exception sites in or on the edge of villages for small schemes of 100% affordable housing. 'Small schemes' is not defined. Given the level of district wide affordable housing need, why is 100% affordable housing required by the policy when para 54 of the NPPF sets out that LPAs should consider whether allowing some market housing would facilitate the provision of significant

---

<sup>2</sup> Paragraph: 031 Reference ID: 23b-031-20161116

<sup>3</sup> Paragraph: 007 Reference ID: 56-006-20150327 and Paragraph: 020 Reference ID: 56-020-20150327

<sup>4</sup> Paragraph: 031 Reference ID: 23b-031-20161116

additional affordable housing to meet local needs. Moreover, the policy is contradicted by the definition of Rural Exception Sites in the Glossary which states that 'Small numbers of market homes may be allowed at the local authority's discretion'.

55. The numbering within the policy should be amended as Parts 2) a) and b) are distinct provisions from 2). They should be numbered 3) and 4).
56. I would recommend that the following wording is included within Policy H3:  
'Affordable housing should be designed as an integral part of developments and be 'tenure blind' in relation to other properties within the site.'
57. Consideration should be given to the modification of Policy H3 to deal with the above points **(MM)**.
58. In relation to gypsies and travellers, para 8.63 explains a 2015 joint-Authority Gypsy and Traveller Accommodation Needs Assessment (GTAA) identified a requirement for 6 residential pitches over the period 2014-19 with an additional 2 residential pitches up to 2034. Although the Policy Topic Paper (ED13.5) refers to residual needs, the LP says nothing about the existing supply or whether there are unmet needs that ought to be addressed through an allocation – the policy simply provides development management criteria. This should be rectified by at the very least the inclusion of the requirement within Policy H4 and an explanation of what provision has been made to meet the need within preamble to the policy **(MM)**.
59. The preferred options version of the LP proposed an allocation at Blythe Bridge for 8 pitches (TR002) but that has not been carried forward due to the site owners indicating that the site was not available. It is understood that no further allocations have been put forward.
60. In terms of the wording of the criteria within Policy H4, reference to the use of soft landscaping rather than hard landscaping (para 26 of the Planning Policy for Traveller Sites) would be helpful **(MM)**. The final section would benefit from rewording so that it reads 'Development of gypsy and traveller or travelling showpeople accommodation in the Green Belt will not be allowed unless there are very special circumstances.'

## **Matter 6 – Employment Land Supply and Policies (including town centres and tourism)**

61. Issues that are likely to be discussed at the hearing session are:
- The effectiveness of Policies E1, E3 and E4 and their consistency with national policy;
  - The terms of Policies TCR1, TCR2 and TCR3 particularly in relation to non-shopping uses and the threshold for impact assessment;
  - The allocation of a site for a discount foodstore in Biddulph.
62. Policy SS4 refers to the employment land requirement of 27 ha and suggests a split of 50% B1a/B1b and 50% B1c/B2/B8. However, elsewhere the LP suggests a flexible approach to occupants should be taken e.g. para 8.35. Is reference within

Policy SS4 to the split of uses too prescriptive?

63. The box below Policy SS4 indicates that the supporting text to the policy has been updated to include reference to the employment allocation in Blythe Bridge being additional to the District's requirement. This text does not appear to have been incorporated (**AM**). Moreover, should the site be referred to in Policy SS4 even though it is meeting a regional need?
64. Policy E1 refers to a number of other policies. Is the reference to Policy SS10 on its own correct in that this only relates to one element of the District (Policies SS5-SS9 and SS11 deal with the others)? As an alternative the policy could simply refer to the 'Area Strategy Policies'.
65. Is all of the last sentence of the 3<sup>rd</sup> bullet point of Policy E1 necessary? If the development is small scale it would fall under the 200 m<sup>2</sup>.
66. With regard to the 4<sup>th</sup> bullet point is the term 'exceptional circumstances' too onerous? It is effectively applying a green belt test for employment development in all of the countryside. Moreover, it appears to be more restrictive than Section 2 of Policy SS10.
67. In referring to sui generis business development (5<sup>th</sup> bullet) what type of uses does the policy envisage? Moreover this element of the policy is more permissive than the part relating to B1b & c, B2 and B8 uses.
68. In relation to the 7<sup>th</sup> bullet the requirement for a sustainable location is more restrictive than Policy H1 and the conversion of rural buildings for residential use.
69. Consideration should be given to the modification of Policy E1 to deal with the above points (**MM**).
70. The 3<sup>rd</sup> sentence of Policy E2 does not relate to the allocations and is dealt with elsewhere (Policies E1 and TCR3). It should be deleted (**AM**).
71. The second part of Policy E3 refers to the 'Redevelopment of such areas...' and presumably links back to the reference to 'Employment areas, premises and allocations...'. Consequently, the initial reference to 'redevelopment' and the further references in parts A, C and D do not make sense in relation to greenfield allocations as they are undeveloped. It would therefore be more logical for the policy to relate to development that leads to the loss of employment land/provision rather than 'redevelopment' (**AM**).
72. Policy E3 and the supporting text (para 8.40) also refer to seeking funding to support off-site employment provision where redevelopment of employment land with employment floorspace would not be viable. It is questionable whether such contributions would meet the legal and policy tests (necessary and reasonable) if employment provision is not viable. Such contributions may be more appropriate in relation to Part C) of the policy when another form of development is considered to outweigh the loss of (viable) employment land.

73. Paragraph 8.38 and the box 'Consistency with Core Strategy' under Policy E3 refer to the Glossary defining 'employment land' and 'employment uses'. There is a definition of 'employment land' in the Glossary but not 'employment uses'. Should there be a separate definition or should the latter also refer to 'employment land' (**AM**)?
74. Part 2A) of Policy E4 does not appear to sit comfortably with parts 1A) to 1C), particularly 1B). 1B) enables development in or close to settlements with services, facilities and public transport but 2A) requires development to support the rural area where needs are not met by existing facilities. Moreover the requirement to demonstrate 'exceptional circumstances' for tourism development in a rural location is a high bar and is not consistent with Part 2A) of the policy.
75. Para 8.44 also states that development outside development boundaries will be limited to the conversion of existing buildings and in exceptional circumstances new buildings. This approach does not form part of the policy and the last bullet point in the 'Consistency with Core Strategy' text box states 'the policy removes the limitation that new tourism schemes be through building conversions only'.
76. Modifications to Policy E4 should be considered so that the various parts are consistent with each other (**MM**).
77. The Retail Capacity Update of November 2017 (ED25.3) did not show any convenience goods capacity in any of the towns. However, the intention of the LP is to allocate land for a new foodstore in Biddulph (Policy SS6 and para 8.70 refer). Is this justified on qualitative grounds? In terms of retail capacity is the 3<sup>rd</sup> sentence of para 8.70 still relevant given the contents of ED25.3?
78. In addition the LP does not appear to be specific about where the allocation will be other than within the Wharf Road Strategic Development Area (Policy DSB1). Is this the most sequentially preferable location? Would the Biddulph Mills Site not provide a better location (edge of centre) assuming that it is otherwise suitable and deliverable? I could not see any analysis of potential sites within the Retail Studies. In any event the allocation should be made explicit and included on the Policies Map (**MM**).
79. In Policy TCR1 the reference to 'vitality and viability' within Part 1 of the policy appears superfluous as town centre uses within town centres would contribute (**AM**).
80. In terms of Part 7 'primary shopping areas' are defined in the Glossary but not delineated within the Maps at Appendices 1-3 of the LP so this section should perhaps just refer to 'town centres'. In addition the definitions of 'Primary Shopping Area' and 'Primary and Secondary Frontages' in the Glossary have not been updated to reflect that 'secondary frontages' are not now part of Policy TCR2 (**AM**).
81. Policy TCR2 refers to preventing a concentration of non-shopping uses but does not define what would constitute a concentration. Consideration should be given to the inclusion of specific criteria within the policy (as set out in para 8.72) (**MM**).
82. The requirement for a sequential assessment should only apply to town centre uses proposed outside town centres so Policy TCR3 is consistent with national policy (para

24 of the Framework refers) (**MM**).

83. The town centre boundaries on the Policies Maps for Leek, Cheadle and Biddulph are drawn fairly tightly. For example town centre uses on the west side of Edward Street (?) are excluded from Leek Town Centre. In Biddulph the Home Bargains site is excluded. In Cheadle the Morrisons and B & M Stores are excluded. Has any analysis been undertaken to support the town centre boundaries? If so where can this be found?

### **Matter 7 – Development Management Policies**

84. Issues that are likely to be discussed at the hearing session are:

- Whether development management policies (Policies SD1, SD2, SD3, SD4, SD5, DC1, DC2, DC3, DC4, C1, NE1 and NE2) are positively prepared and consistent with national policy;
- The delivery of Open Space and other GI (Policies C2 and C3).

85. Paragraph 8.5 indicates that Policy SD1 supports the use of previously-developed land. However, there is no specific provision within the policy (or indeed Policy SS1) albeit that Parts 2. and 3. are relevant.

86. Paragraph 8.17 refers to poor air quality. Are there any Air Quality Management Areas within the District? (para 124 of the Framework refers).

87. Policy SD5 in dealing with surface water seeks sustainable drainage systems. Is the policy robust enough as discharge to the public sewer should be seen very much as a last resort?

88. The explanation to Policy DC1 refers to Design and Access Statements (DAS) (para 8.75) but does not define what constitutes 'suitable planning applications'. Section 9 of the Development Management Procedure Order sets out when DAS are required and could be usefully referenced here (**AM**).

89. Paragraph 8.78 appears very detailed as part of the explanation to a generic design policy. Is it necessary? (**AM**).

90. With regard to the policy itself, in Part 5 'visual impact' would be a more neutral term than 'overbearing development' (**AM**).

91. The clarity of Policy DC3 would be improved with the following change:  
Part 1 – 'significant adverse impact on the character...'

92. Are the important views into and out of settlements referred to in Part 1 clearly identified in the Landscape and Settlement Character Study?

93. In terms of Part 3 'conserve or enhance' would be more positive than 'maintains'.

94. Part 4 is more relevant to flood risk and Policy SD5 rather than landscape and settlement setting.

95. Does Part 6 need to refer to the landscape in the PDNP or just its setting given the scope of the LP?
96. Para 78 of the NPPF specifies that local policy for managing development within a Local Green Space should be consistent with policy for Green Belts. Therefore, should the wording of Policy DC4 refer to national Green Belt policy being applied, in a similar manner to Policy SS10 part 6 and Policy H1 part 6 rather than referring to 'very special circumstances'? **(AM)**
97. Paragraph 8.99 explains that a proposal involving the loss of community facilities 'will be judged on its own merits'. This phrase runs counter to the NPPF and the requirements of Policy C1. Part 3 a) is fairly weak as there may be an alternative facility of the same type but would it be of similar quality and meet the needs of the community? In some settlements more than one facility of the same type may be desirable e.g. shops or public houses. Part 3 b) could refer to the option of a shared use/space or multiple use e.g. public house and shop, or the building being offered to the local community at a reasonable price. Would Parts 6, 7 and 8 be best dealt with under Policies DC1, T1 and T2 respectively?
98. Policy C2 only appears to require provision of open space etc 'where there is a proven deficiency'. However, new development should make open space provision to meet its own needs. Is 'qualifying' development defined in the LP? Is it clear how much open space and what type will be required in new developments? I note the contents of ED23.2 but how easy will it be to interpret the paper's recommendations, particularly until such time an SPD is adopted? Would it be worth transcribing the quantity standards (Table 4.3.1) into the LP? **(MM)**
99. Part 1 of the policy is similar to para 74 of the Framework albeit not entirely consistent with it. Notably the consideration in the final bullet point of para 74 of the NPPF appears to be absent from Part 1 of the policy, namely 'the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss'. Should Part 1 and para 74 be entirely consistent or would it be simpler just to cross reference with national policy? **(MM)**
100. The first paragraph of Policy C3 refers to developing an integrated network of green infrastructure and para 8.109 refers to a Green Infrastructure (GI) Strategy supporting the policy. Later in the LP (the 2<sup>nd</sup> sentence of para 8.114 related to Policy NE1 on Biodiversity in the Natural Environment section) reference is only made at that point to the preparation of a 'Strategic GI Network' for the plan area which identifies a series of strategic corridors designed to link existing (and proposed) green spaces with green corridors running through towns, villages and rural areas. It would perhaps be logical to include this detail earlier, in the GI section. **(AM)**
101. Para 8.115 refers to nature conservation sites being shown on the Policies Map. It is assumed that this is a reference to the 1998 Local Plan Proposals Maps which will be updated when the LP is adopted? That said I could not identify any Nature Conservation Sites on the District Wide Proposals Map.
102. I question whether the final sentence of the 2<sup>nd</sup> bullet point of Policy NE2 is necessary as there should not be many circumstances where new or replacement tree planting

could not be secured on site. (MM)

103. In dealing with transport should Policy T1 make reference to the potential link roads in Leek and Cheadle and the need for the routes to be protected? (MM)

104. There is an element of repetition in paragraphs 8.125 and 8.134 (AM).

### **Matter 8 –Housing, Employment and Mixed Use Allocations**

105. Issues that are likely to be discussed at the hearing sessions are:

- The strategies for the different settlements (SS5-SS10);
- The site selection process, principally the SHLAA;
- The suitability of the allocations having regard to infrastructure and other constraints and the need for a range of sites;
- Whether any significant adverse impacts would arise for the economic, social and environmental dimensions of sustainable development, taking into account potential mitigation;
- The development criteria;
- The delivery of the allocations over the plan period.

106. The intention is to have separate hearing sessions to cover Leek, Biddulph, Cheadle and the Villages.

107. In terms of the policies overall they refer to generic infrastructure and development requirements e.g. the provision of landscaping, flood risk assessment, infrastructure contributions, affordable housing etc. However, many of these requirements are covered by other policies of the LP. In some policies the generic requirements differ. To ensure consistency and clarity it would be preferable for requirements within the policies to be limited to those which are bespoke (para 9.1 refers). If necessary an introductory para to the chapter could make reference to the main generic policies that would apply (MM).

108. The housing site references used in the Maps in Appendices 1-4 could helpfully be included in the respective allocation policies and not just included in Policy H2. i.e. from reading Policy DSC2 – Cecily Brook Strategic Development Area, it is not clear that it includes three sites, (CH002a, CH002b and CH024 – the latter being some distance to the north of the other two).

#### Leek

109. Policy DSL1 –\_bespoke requirements could include:

- landscaping to form a new settlement edge;
- Site Investigation (para 9.5 refers);
- Access via Tittesworth Avenue;
- Phasing of school extension.

110. Policy DSL2 – bespoke requirements could include:

- Highway/junction improvements;
- Phasing of school site;

- Retaining/integrating landscape features, including those on site of Kniveden Hall.
- Master Planning given multiple ownerships.

111. The wording of the final para is convoluted.

112. Policy DSL3 - bespoke requirements could include:

- Phasing/master planning of residential and employment development;
- South-east corner to remain undeveloped (para 9.21);
- Retention of tennis courts;
- Off-site pedestrian and cycle links.

113. The first part of the policy should refer to the number of hectares intended for residential development (5.25 ha) and approximately 180 dwellings rather than a precise number.

114. Policy DSL4 – bespoke requirements could include:

- Phasing/master planning of residential and employment development;
- Safeguarding/provision of link road;
- Access off A520;
- Mitigation/compensation for loss of Birchall Meadow.

115. To be consistent with other allocations the policy should refer to the amount of employment land (0.83 ha according to Policy E2).

#### Biddulph

116. The explanation to Policy DSB1 should describe the exceptional circumstances that justify the removal of land to the west of Biddulph Valley Way (BVW) from the Green Belt. Bespoke requirements could include:

- Phasing/master planning of residential, employment and retail development;
- Landscaping to form a new settlement edge;
- Site investigation;
- Heritage asset protection;
- Treatment to culvert;
- GI;
- Pedestrian and cycle links to BVW.

117. Policy DSB2 – see comments above re possible retail development. There do not appear to be any bespoke requirements. Para 9.51 is confusing and contradictory. Para 9.52 includes unnecessary detail e.g. size of garages.

118. Policy DSB3 - The explanation to Policy DSB3 should describe the exceptional circumstances that justify the removal of land from the Green Belt. Bespoke requirements could include:

- Phasing/master planning of residential and employment development;
- Access via traffic light controlled junction (Victoria Business Park);
- Site investigation;
- Safeguarding of public right of way.

119. Para 9.59 includes unnecessary detail e.g. size of garages. The 1<sup>st</sup> sentence of para 9.60 is confusing.

#### Cheadle

120. Policy DSC1 - bespoke requirements could include:

- Phasing of school site;
- Site investigation;
- Mitigation to Cecilly Brook;
- Setting of heritage asset;
- Provision of 2 access points;
- Safeguarding of public rights of way.

121. The reference to use of land outside the site for open space in para 9.73 needs explanation. Open space requirements would normally be provided within a development site. Does the site owner have control of additional land? Should this land be included within the allocation but retained solely for open space/surface water mitigation?

122. In terms of the policy itself the first part of the 5<sup>th</sup> bullet point is not clear – ‘Consideration of the growth that may impact...’

123. Policy DSC2 - bespoke requirements could include:

- Master planning;
- Mitigation to Cecilly Brook;
- Creation of landscaped edge to settlement.

124. The reference to use of land outside the site for open space in para 9.79 needs explanation. Open space requirements would normally be provided within a development site. Does the site owner have control of additional land? Should this land be included within the allocation but retained solely for open space/surface water mitigation?

125. In terms of the policy itself the first part of the 1<sup>st</sup> bullet point is not clear – ‘A masterplan that considers the growth...’

126. Policy DSC3 - The explanation to Policy DSC3 should expand on the exceptional circumstances that justify the removal of land from the Green Belt (para 9.82). Bespoke requirements could include:

- Master planning and phasing;
- Safeguarding/provision of link road;
- Setting of heritage asset;
- Safeguarding of public rights of way.

127. The reference to use of land outside the site for open space in para 9.84 needs explanation. Open space requirements would normally be provided within a development site. Does the site owner have control of additional land? Should this land be included within the allocation but retained solely for open space/surface water mitigation?

128. The disused Cheadle to Cresswell railway line to the north-west of the allocation appears to perform as GI but is not safeguarded as such on the policies map. Are there any proposals to restore the line as a pedestrian/cycle route?

129. Policy DSC4 – bespoke requirements could include:

- Site investigation;
- Site access.

130. With regard to site access would use of New Haden Road be appropriate as it has the characteristics of a country lane?

### The Rural Areas

131. Policy DSR1 – the explanation to the policy explains that the housing element would assist in meeting OAN without requiring additional Green Belt land. However, the scale of housing could be seen as distorting the spatial strategy. Indeed potential provision in the rural areas exceeds the requirement by about 100 dwellings (Policy SS4). Is the scale of residential development intended more for enabling purposes? Moreover the policy does not quantify how much employment land should be delivered (unlike other mixed use allocations) so could be vulnerable to more housing development if there are housing supply/delivery issues in the future. This could further skew the LP's spatial strategy. It would also be helpful if the policy made it clear that the allocation is to serve a regional need.

132. In terms of the policy itself bespoke requirements could include:

- Master planning and phasing of employment and residential;
- Landscape mitigation on the site edges;
- Sustainable transport routes;
- GI strategy.

133. Para 9.98 refers to rail links. Is there an intention to promote a new station or will there be reliance on the existing station at Blythe Bridge?

134. Policy DSR2 - Should the policy refer to the whole 8 ha to allow mitigation to be secured? Is access via the existing industrial estate feasible given the siting of existing industrial buildings and associated development at the head of the estate road? Bespoke requirements could include:

- Ecological mitigation;
- Setting of heritage asset.

135. Policy DSR3 – Should the policy refer to the whole 1.67 ha to allow mitigation to be secured? Given the topography of the site and its landscape characteristics would it be feasible and viable to develop the site for employment use? If appropriate for development bespoke requirements could include:

- Specific landscape mitigation;
- Access via Dockseys.

136. Policy DSR4 - The explanation to Policy DSR4 should expand on the exceptional circumstances that justify the removal of land from the Green Belt (paras 9.120 and 9.123). Bespoke requirements could include:

- Landscape mitigation to site boundaries and top of site (WE003);
- Access points;
- Noise mitigation.

### **Matter 9 – Infrastructure and Delivery**

137. Issues that are likely to be discussed at the hearing session are:

- The effectiveness of Policy SS12;
- Whether necessary infrastructure will be delivered in a timely fashion e.g. road improvements, schools, health services.

138. Paragraph 7.75 refers to the Community Infrastructure Levy (CIL). What is the timetable for the introduction of CIL in Staffordshire Moorlands?

139. Policy SS12 refers to the use of planning obligations to secure infrastructure and the application of standard formulae. What are the implications of the pooling limitations on developer contributions?

140. In framing these questions I am aware of the Government's consultation on reforming developer contributions.

### **Matter 10 – Monitoring and Implementation**

141. Issues that are likely to be discussed at the hearing session are:

- Monitoring Indicators;
- LP Review Mechanisms

142. Paragraph 10.4 refers to the need for reviews of policies or the strategy overall. The LP should make it clearer when a partial or full review of the LP would be required. The need for review or partial review would be best linked to particular key indicators contained within the table on pages 201 to 212 such as those related to the delivery of housing. Reference could also be made to the need for review because of a significant change in circumstances related to national policy or the evidence base (MM).

143. There are two separate tables dealing with implementation and monitoring. These should be combined with the emphasis on the Monitoring Indicators and Targets.

### **Other Minor Comments**

144. I noted a number of typos when reading the LP and have also suggested some minor changes to assist with clarity. These do not go to soundness but to be helpful I have set these out in **Appendix 2**.

### **Future Programme**

145. I would envisage the following indicative timetable for the examination of the LP up to the hearing stage.

- 14 August - Council response to Inspector's Preliminary Views;
- 24 August - Inspector prepares Matters, Issues and Questions (MIOs);
- 24 August – 6 weeks' notice given for hearings;

- 24 September – deadline for submission of statements for hearings;
- 1 October onwards – final agendas prepared for hearings (agendas prepared about 1 week before the relevant hearing);
- 9-23 October – hearing sessions.

146. I would welcome the Council's views on this indicative timetable.

### **Response**

147. I would like a response by the Council to the above comments and questions by **14 August 2018** or earlier if possible. I am not inviting comments from other parties at this stage. I want to clarify the Council's position first. This will help me to refine Matters and Issues for the hearings and set agendas and questions. All parties with relevant representations will have the opportunity to respond in advance of the hearings should they wish.

148. As referred to earlier if the Council consider that the point or question could be dealt with by a **MM** or **AM** then please confirm. As the examination develops Schedules of MMs and AMs should be produced. The former should be in place in draft form in advance of the hearings, preferably published at the same time as any statements when it will become an examination document and inform discussion at the hearings. It will be refined during and after the hearings. This is on the assumption that the Council wish me to recommend any MMs that are necessary to resolve issues of legal compliance or 'unsoundness'.

149. If you require clarification of any of the above points please contact me via the Programme Officer.

*Mark Dakeyne*

INSPECTOR

24 July 2018

***Attached – Appendices 1 and 2***

## **Appendix 1 – Possible Hearing Programme**

### **Tuesday 9 October**

9.30 – Introduction to the Hearings, Legal Compliance, Procedural Requirements and the Duty to Cooperate

13.30 - Strategy and Strategic Policies

### **Wednesday 10 October**

09.30 - Housing and Employment OAN and Requirements

13.30 - Housing Land Supply

### **Thursday 11 October**

09.30 – Specific Housing Needs and Generic Housing Policies

13.30 - Employment Policies (including town centres and tourism)

### **Friday 12 October**

09.30 - Development Management Policies

### **Tuesday 16 October**

09.30 – Allocations (Leek)

13.30 – Allocations (Biddulph)

### **Wednesday 17 October**

09.30 – Allocations (Cheadle)

13.30 – Allocations (Villages)

### **Thursday 18 October (hearing venue not available)**

Inspector Site Visits

### **Friday 19 October**

09.30 – Infrastructure and Delivery

12.30 – Monitoring and Implementation

### **Tuesday 23 October**

11.30 – Review Session

## **Appendix 2 – Minor Queries and Typos**

### 1. Introduction and background

Box after para 1.3 and elsewhere within the LP e.g. Chapter 9 – Do all the allocations fit the description of ‘Strategic Development Sites’? Some are relatively small. As I understand it no further allocations are proposed through a separate DPD so would it be more appropriate to refer to them as ‘Strategic and Other Sites’?

Para 1.6 – the Examination commences once the LP is submitted to the Secretary of State/Planning Inspectorate. The hearings form only part of the overall examination. The examination commenced in July 2018 (see also box under para 2.7).

Para 1.8 – There is no reference to the SA within the list of evidence documents.

Paras 1.12 to 1.14 – It would be useful to refer to the Policies Map here and the fact that it will change to when the LP is adopted. Is a copy of the existing Policies Map available

Para 1.18 – This is the first time that the NPPF is mentioned and so its full title should be included here with the abbreviation in brackets (not at para 1.25 or para 1.44).

Para 1.41 – How does land at Blythe Vale relate to the HS2 hub-station at Crewe?

Para 1.48/line 3 – delete ‘is’.

### 4. The Challenges

Para 4.1 – in the box ‘Improving the housing market’ there is reference to the need to rebalance the housing stock. This does not appear to be consistent with what is said at para 3.6.

### 7. Spatial Strategy and Strategic Policies

Policy SS2 - refers to a ‘Development Boundary’ being defined for the Towns and Larger Villages. Appendix 4 identifies the Larger Villages but refers to a ‘Village Boundary’. There should be consistency in the terminology.

Policy SS2 – ‘Other Rural Areas’ – missing ‘of’ at end of 3<sup>rd</sup> line.

Para 7.30/line 9 – ‘term’ not ‘terms’

Para 7.31 – the clarity would be improved if the para started with ‘Policy SS4 sets out how...etc’

Para 7.45 – line 4 – ‘locations’, line 9 – no space between sentences.

Para 7.64 - should refer to SS9 rather than SS10.

Policy SS10 – Section 3/4<sup>th</sup> bullet – no space between ‘with’ and ‘Policy’

Consistency with Core Strategy – 1<sup>st</sup> 2<sup>nd</sup> and 3<sup>rd</sup> bullets relating to ‘essential needs’ lack clarity and contain repetition.

Policy SS11 – repetition within the policy – ‘Development should/shall be in accordance with the Masterplan’.

Policy SS12 – ‘formulae’ not ‘formulate’

Key Diagram – the small village of Swinscoe is not included.

## 8. Development Management Policies

Chapter 8 of the LP includes a wide range of policies dealing with sustainability issues, employment, housing, town centres and generic development management policies. In my view the LP would be easier to navigate and be clearer if separate chapters were used for different groups of policies.

Para 8.6/line 4 – ‘likelihood’ misspelt. Is ‘likelihood of’ needed in the sentence?

Para 8.7 - should refer to Part 5 of Policy SD1 rather than Part 4.

Para 8.10 – is the Minerals Local Plan available as part of the evidence base?

Para 8.12/line 14 – duplication of ‘schemes’

Policy SD4 – 2<sup>nd</sup> para, penultimate line – ‘of’ not ‘for’

Para 8.21/line 3 – ‘about’ not ‘to’

Para 8.22 – as this is the first place that ‘Environment Agency’ appears the abbreviation of EA used elsewhere should be inserted after the full name e.g. (EA). The same applies to Lead Local Flood Authority (LLFA) used later in the para.

Para 8.24 – abbreviation WFD used for the first time – use full title with (WFD) in brackets afterwards.

Para 8.24/line 5 – ‘The Council...’

Para 8.25 – starting the para with ‘Policy SD5 is designed...’ would be clearer.

Para 8.26 – repetition here – point already covered in para 8.25.

Policy SD5/4<sup>th</sup> para – ‘Lead Local Flood Authority’

Para 8.28/6<sup>th</sup> sentence – ‘Note that’ is superfluous.

Para 8.28/last line – ‘than in Policy E1’

Paras 8.35 & 8.36 – ‘Note that’ (x3) superfluous.

Para 8.36/line 2 – space between ‘element’ and ‘covering’

Policy E2 – ‘The following sites as identified on the Policies Map are allocated...’

Para 8.42 – starting the para with ‘Policy E4 positively supports....’ would be clearer.

Para 8.43 – 3<sup>rd</sup> sentence – amend to read ‘At present a very low proportion of visitors to the Moorlands stay overnight in serviced accommodation and supply is particularly low in the three towns.’?

Para 8.46 - starting the para with ‘Policy H1 seeks to ensure....’ would be clearer.

There is repetition in paras 8.46 and 8.47 – ‘an appropriate range and type of housing’ ...‘an appropriate range and mix of housing’.

Policy H1 – Part 3) c) – the 2<sup>nd</sup> sentence would be clearer if it read: ‘Higher densities will generally be appropriate in locations which are more accessible by public transport.’

Policy H1 – Part 4) c) – ‘...or have a significant adverse impact on the character and appearance of the countryside.’

Consistency with Core Strategy (page 111) – the Section titled R2 does not appear to be relevant.

Para 8.54 - should refer to ‘the sites below’ rather than ‘the above sites’.

Para 8.62/line 1 – delete ‘Guidance’

Para 8.83/line 3 – insert ‘and’ after ‘Registered Battlefields’

Para 8.90 – abbreviations HER and GPA need to be explained as this appears to be the first time they are used.

8.93 - starting the para with ‘Policy DC3 provides protection....’ would be clearer.

Policy C2 – Part 3 e) – ‘not inappropriate in the Green Belt’

Para 8.106 – ‘lie within’ rather than ‘intersperse’?

Para 9.8 - abbreviations SBI and BAS need to be explained as this appears to be the first time they are used.

Para 9.43 - abbreviation HEGS needs to be explained as this appears to be the first time it is used.

Para 9.35 – include ‘(BVW)’ after Biddulph Valley Way.

Para 9.58 - abbreviations HLC and BBHECZ need to be explained as this appears to be the first time they are used.

Para 10.1 – too many bullet points relative to the text.