

## **Staffordshire Moorlands Local Plan – Schedule of Additional Modifications September 2018**

**(including those listed 31<sup>st</sup> May 2018)**

<b>Mod No.</b>	<b>Page</b>	<b>Para/Policy Number</b>	<b>Proposed Modification (deleted text has <del>strikethrough</del>, new text is <u>underlined</u>)</b>	<b>Reason</b>
AM1	Various	All 'Consistency with Core Strategy' boxes following policies (Various)	All 'Consistency with Core Strategy' boxes to be deleted following adoption of the Local Plan	To update Local Plan following adoption (superseding of Core Strategy).
AM2	Various	Various	Consequential re-numbering of paragraphs, following insertion of new paragraphs (eg between 8.105 and 8.106)	Consequential amendments
AM3	6	Box after para 1.3	<p>This Local Plan comprises of the following:</p> <ul style="list-style-type: none"> <li>• A Portrait of Staffordshire Moorlands - a description of the District</li> <li>• The Challenges - a summary of the key challenges facing the District</li> <li>• The Vision – detailing what the Staffordshire Moorlands will be like in 2031</li> <li>• Aims and Objectives – stating what the Local Plan is proposing to achieve</li> <li>• A Spatial Strategy and Strategic Policies – setting out the over-arching strategy and policies for the District</li> <li>• Development Management Policies – setting out specific measures to manage development</li> <li>• Strategic Development Site Policies - specific policy to guide the development of strategic sites <u>and others requiring bespoke policy</u></li> <li>• Implementation and Monitoring - a framework for how the plan will be implemented and monitored</li> <li>• Maps - for Leek, Biddulph, Cheadle and the Rural Areas which identify proposed sites and boundaries</li> </ul>	To clarify that the Plan contains strategic development site policies, concerning both strategic-scale sites, and other sites behoving dedicated site policies (in response to inspector's preliminary questions).
AM4	7	1.6	<p><b>Statutory Period for Representations on the Submission Version Local Plan</b></p> <p>This is a statutory stage in the Local Plan process where the Council publishes its</p>	To update references throughout the Plan, and clarify the difference between

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			final draft of the Local Plan, the 'Submission Version' and invites comments on the soundness and legal compliance of its content during a 6 week period. <u>This took place between 27<sup>th</sup> February and 11<sup>th</sup> April 2018.</u> All representations received at this stage <del>will be</del> <u>were forwarded on 'submitted'</u> to the Secretary of State alongside the Submission Version Local Plan. <del>The 'submission' of these (and other relevant) documents is anticipated to take place in June 2018. Those objectors from the statutory period for representations had</del> <u>will have</u> the right to be heard at an examination in public either in writing (written representations) or verbally at a hearing session conducted by an independent inspector appointed by the Secretary of State. <del>Both methods carry equal weight. It is anticipated that The examination hearings will begin in September</del> <u>took place in October 2018.</u>	examination hearings, and the wider examination process, in response to the Inspector's preliminary questions.
AM5	7	1.8 (bullet list)	<ul style="list-style-type: none"> <li>• Strategic Housing Market Assessment (SHMA) (2014) and Update (2017)</li> <li>• Employment Land Study (2014) and Update (2017)</li> <li>• <u>Sustainability Appraisal Report (Submission version Local Plan) (2018)</u></li> <li>• Updated Gypsy and Traveller Needs Assessment (2015)</li> <li>• Retail Study (2013)</li> <li>• Retail Impact Assessment Thresholds Review (2017)</li> <li>• Level 1 Strategic Flood Risk Assessment Update (SFRA) (2015)</li> <li>• Ecological Studies (2015, 2016 and 2017)</li> <li>• Cheadle Town Centre Transport Study (2015) and Phase 2 Assessment (2017)</li> <li>• Green Belt Review (2015) and Updates (2016 and 2017)</li> <li>• Strategic Housing Land Availability Assessment (SHLAA) (2015)</li> <li>• Green Infrastructure Strategy (2017)</li> <li>• Open Space Update Report and Standards Paper (2017)</li> <li>• Playing Pitch Strategy (2017)</li> <li>• Development Capacity, Viability and Community Infrastructure Levy Study (2018)</li> <li>• Infrastructure Delivery Plan (2018)</li> <li>• Habitats Regulations Assessment of Submission Version Local Plan (2018)</li> <li>• Landscape, Local Green Space and Heritage Impact Assessment (2016 and 2017)</li> </ul>	To include reference to the Sustainability Appraisal as part of the evidence base in response to the Inspector's preliminary questions.
AM6	9	1.12	<del>Once adopted, The new adopted Local Plan will form</del> <u>part of the statutory Development Plan setting out the local planning authority's policies and proposals</u>	For clarity and in response to the Inspector's preliminary

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			for the development and use of land and buildings in the authority's area. Decisions on planning applications are required to be made in accordance with the Development Plan unless material considerations indicate otherwise. The material considerations could include national planning policy or significant local issues that have arisen since the Development Plan was prepared. <u>The Local Plan Policies maps replaced the previous policies maps attached to the 1998 Local Plan.</u>	questions.
AM7	9	1.18	The NPPF ( <u>National Planning Policy Framework</u> ) also sets out policy in respect of minerals and waste to ensure that minerals of local and national importance are not needlessly sterilised by non-mineral development and that waste is appropriately managed. It also requires the prior extraction of minerals to be considered in these areas where practicable and feasible, if it is necessary for non-mineral development to take place.	For clarity and in response to the Inspector's preliminary questions.
AM8	10	1.22	There are currently <del>six</del> <u>eight</u> "Neighbourhood Areas" in which Neighbourhood Plans are being prepared in the District: Biddulph Brown Edge Checkley <u>Forsbrook</u> <u>Leek</u> Leekfrith Draycott-in-the-Moors Rushton	To ensure the most up to date information on neighbourhood planning and in response to the Inspector's preliminary questions.
AM9	10	1.23	<del>Two</del> <u>Other</u> areas have expressed an interest in producing a Neighbourhood Plan and are due to formalise their neighbourhood areas. <del>They are Forsbrook and Leek.</del>	To ensure the most up to date information on neighbourhood planning and in response to the Inspector's preliminary questions.
AM10	10	New paragraph after 1.23	<b><u>Supplementary Planning Documents</u></b>  <u>In addition to the Development Plan Supplementary Planning Documents (SPD) also provide further guidance and background details to support the implementation of policies. They include:</u>  <ul style="list-style-type: none"> <li>• <u>Developer Contributions SPD (to be updated)</u></li> <li>• <u>Design Guide (adopted 2018)</u></li> </ul>	To clarify the SPDs that will supplement the Local Plan in response to the Inspector's preliminary questions.

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			<ul style="list-style-type: none"> <li>• <u>Churnet Valley Master Plan SPD (adopted 2014)</u></li> <li>• <u>Leek Town Centre Master Plan SPD (adopted 2014)</u></li> <li>• <u>Cheadle Town Centre Master Plan SPD (adopted 2014)</u></li> </ul>	
AM11	15	Para 1.48	An Equalities Impact Assessment has also been undertaken to consider how the Local Plan may impact upon different groups within the community. A Habitats Regulations Assessment <del>is</del> has also been prepared. With the recommended mitigation measures, the report concludes that the Submission Local Plan will not result in adverse effects on European sites, both alone and in combination with growth in neighbouring areas. These documents are also available to view at Council offices and on the Council's website.	Grammatical correction.
AM12	17-18	Section 2 How to Respond	Section to be deleted following adoption of Plan	To update the Plan, in response to the Inspector's preliminary questions.
AM13	20	Location of the Staffordshire Moorlands Map	Amend map to show Peak District National Park boundary	To clarify the fact that the Local Plan only relates to the part of the District outside of the National Park in response to LPS27. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)

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			<p style="text-align: center;">Location of the Staffordshire Moorlands</p> <p>© Crown copyright and database rights 2018. Licence No. 100018384</p>	
AM14	27-28	<b>Improving the housing market box under para 4.1</b>	<p>Amend 2<sup>nd</sup> bullet as follows:</p> <p>There is a need to re-balance the housing stock <u>for example a need for more terraced properties and more rental sector properties</u> <del>away from smaller terraced properties towards</del> <u>and</u> better quality, aspirational properties to reduce the levels of net out-migration to neighbouring areas. There is also a need for accommodation to support a growing elderly population.</p>	To make this para consistent with evidence and other references in the Plan in response to the Inspector's preliminary questions.

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	45	Policy 1a Presumption in Favour of Sustainable Development	Amend number of policy to <u>SS1a</u>	To accord with the numbering prefix convention applied to other policies. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM15	47	Policy SS2 Settlement Hierarchy	Amend 4 <sup>th</sup> para:  <b>Other Rural Areas</b> – this comprises of the open countryside and green belt where further development is generally inappropriate. Within these areas there are some groups of houses and hamlets which are not identified as 'smaller villages' because <u>of</u> their predominantly open character and loose-knit nature. They also contain major developed areas which may be suitable for appropriate development or redevelopment.	Grammatical correction.
AM16	49	7.26	Amend second sentence to read: 'The SHMA and Employment Land Studies have been co-ordinated and based on common <del>the</del> data and scenarios in order to better understand the relationship between housing and employment and to support an appropriate balance of development.'	To correct a typographical error.
AM17	51	7.30	The objectively assessed need for housing as identified in the Strategic Housing Market Assessment relates to the District as whole. As such, this includes the parts of the District that lie within the Peak District National Park. The Peak District National Park Authority have their own adopted Core Strategy which governs development across the National Park. Due to the constraints and purposes of the National Park, the Core Strategy does not include housing requirements. However, in recognition of the fact that the identified housing requirements for Staffordshire Moorlands includes parts of the National Park, the National Park Authority has agreed to an allowance of 100 dwellings being identified in the housing land supply for the Staffordshire Moorlands Local Plan. (3) This allowance reflects long terms annual average housing completions in the parts of the District that lie within the National Park. Whilst the Peak District National Park Core Strategy does not allocate land for housing, the allowance will be factored in to the windfall allowance for the District and housing completions and commitments within the National Park will be monitored accordingly. The table below identifies the net housing requirement for the District once completions, commitments and the Peak District National Park allowance are taken into account. (4) <del>Footnote</del> As of 31 March <u>2018</u> <del>2017</del>	Grammatical corrections and to update the base date information to 31 March 2018.

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AM18	52	7.31	<del>This Policy SS4</del> sets out how the net housing requirement of 3859 will be met across the District up to the year 2031. Sources of future supply include allocations as set out in Policy H2 and windfall allowances for each area based on past trends. Windfall sites will be considered in the context of the Spatial Strategy and Policy H1. From the end of 2017, the Council will be required to publish and update a Brownfield Register of sites that are suitable for housing development. If appropriate, the Council also use the Brownfield Register to grant some of the sites on it with "Permission in Principle". This potential additional source of housing land supply will be considered in the next iteration of the Local Plan.	For clarity in response to inspector's preliminary questions.
AM19	54	7.39	In Neighbourhood Plan areas that plan for housing and employment, provision must be made for at least as much development as identified in the Local Plan. This policy sets out Neighbourhood Area housing requirements as of 31 March 2017. A methodology for calculating future requirements is provided at Appendix 11. For the avoidance of doubt, development requirements do not apply to the Peak District National Park where a Neighbourhood Area spans the Local Plan boundary. In such circumstances, development requirements only relate to the parts of the Neighbourhood Area located within the boundary of the Staffordshire Moorlands Local Plan. <u>Nevertheless, where appropriate, and with the agreement of the Peak District National Park Authority, housing provision towards these neighbourhood area requirements may be met elsewhere in the neighbourhood area and potentially within the Peak District National Park. This approach is consistent with the allowance for completions within the National Park boundary counting towards the Local Plan when located within the District as set out at Paragraph 7.30.</u>	To clarify the approach to neighbourhood area requirements in response to LPS30. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM20	58	7.45	Policy SS4 details an employment land requirement of 8.1ha for the Leek area up to 2031. Employment provision will be met through the expansion of existing employment areas to the south of the town and Leekbrook which have good access to the road network. These are considered to be the most sustainable locations for employment development and will minimise the impact of development on the countryside and residential areas. In response to Leek's residual employment land requirements Policy SS3 of the 2014 Core Strategy identified 'Broad location EM2' east of Brooklands Way Leekbrook, for future employment allocation (dependent on the need for further employment land provision across the town). <u>Despite being a smaller village Leekbrook is closely related to Leek (falling within the same Ward), and it is considered that allocations across the village can contribute towards the future employment land requirements for Leek as existing industrial areas in the village already serve</u>	Grammatical corrections.

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			Leek residents; and industrial areas by definition often tend to be peripheral.	
AM21	65	7.54	One of the most significant challenges is identifying the need for and viability of a link road to relieve through traffic in the town and provide improved access to existing and planned housing and employment areas.	For clarity in response to LPS85. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM22	71	7.61	Development on a large scale would be unsustainable in these villages, as it is will generate a disproportionate number of additional journeys outside the village and may undermine the spatial strategy. Development will be strictly controlled in order to ensure that the character and life of the settlement is not undermined. Boundaries are not defined for smaller villages However, some are set within the Green Belt by virtue of the alignment of the Green Belt boundary, <del>except where they have been excluded from the Green Belt</del> . Limited development, including infill will be supported subject to this policy and Green Belt policy set out in the National Planning Policy Framework.	To clarify the position in relation to Green Belt and village boundaries in response to the Inspector's preliminary questions.
AM23	74	7.64	Within these areas there are some smaller settlements and hamlets which are not identified in Policy <del>SS10</del> <u>SS9</u> as 'Small Villages' because their predominantly open character, loose-knit nature and lack of services and facilities.	Factual correction in response to inspector's preliminary questions.
AM24	75	SS10 Other Rural Areas Strategy	Amend 4 <sup>th</sup> bullet Section 3:  Recognising and conserving the special quality of the landscape in the Peak District National Park (in accordance with Policy DC3);	Grammatical correction.
AM25	80	SS11 Churnet Valley Strategy	Delete last sentence:  <del>Development shall be in accordance with the Churnet Valley Masterplan.</del>	Delete superfluous reference (already contained in first para) in response to inspector's preliminary questions.
AM26	81	SS12 Planning Obligations and Community Infrastructure Levy	Amend first para:  Development proposals will be required to provide, or meet the reasonable costs of providing, the on-site and off-site infrastructure, facilities and/or mitigation necessary to make a development acceptable in planning terms through the appropriate use of planning obligations and/or conditions. Standard formulate will be applied when applicable. The Developer Contributions SPD will provide further guidance on how contributions will be calculated.	Grammatical correction.
AM27	86	8.6	Government Policy states that Councils should take into account the economic	Grammatical correction.



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			and other benefits of the best and most versatile (BMV) agricultural land with a preference for development of areas of poorer quality land over those of a higher quality. The Council has used the Natural England likelihood of Best and Most Versatile dataset and this formed part of site assessments against the sustainability appraisal framework. Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important that soils are protected and used sustainably. Development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. However soil protection needs to be balanced against other Council policies which for example expect demonstration of appropriate housing density for its location, with higher densities expected in more accessible locations, to encourage more sustainable patterns of development. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity. Developers should refer to the Defra Code of practice for the sustainable use of soils on construction sites.	(Dataset does relate to 'likelihood of' best and most versatile agricultural land). (In response to inspector's preliminary questions).
AM28	86	8.7	The submission of environmental information listed in Part(4) <del>(5)</del> SD1 for major developments (broadly as defined in the Development Management Procedure Order) will enable the Council and applicant to explore how they can further contribute towards improving a scheme in relation to climate change/carbon-saving in the context of the viability expectations of the NPPF. Such information may be submitted as part of a Design and Access Statement or separately. Where the Council considers insufficient information has been submitted given the complexity of the proposal, it may request further information to cover the expectations regarding this part of the Policy.	Factual correction in response to inspector's preliminary questions.
AM29	89	8.12	In line with National Policy, Policy SD2 gives support to new renewable energy development generally without differentiating between forms, as the District has natural characteristics (e.g. river flows) which could make this viable – either now, or due to future technology. In the case of wind energy proposals, the Policy clarifies that recent Government NPPG Policy (in particular Ministerial Statement HCWS42) will be applied, as the Local Plan does not currently designate any "areas identified as suitable for wind energy development". Policy SD2 also recognises that the siting and design of all stand-alone renewables installations requires careful consideration, to protect the natural and built environment, and other amenities, without precluding the supply of any type of renewable energy. Renewables schemes can also impact upon heritage assets such as Listed	Grammatical correction.

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			Buildings; it is understood Historic England are preparing an Advice Note, which developers should review where appropriate. The viability of different forms of renewable energies, within different areas of the District, is examined in the CAMCO work (which may in future be informed by further local evidence). Note that <del>schemes for</del> non-renewable energy schemes not covered by this policy (such as fossil fuel generators), will be assessed against all relevant policy, including the National Policy Statements.	
AM30	91	Policy SD 3 Sustainability Measures in Development	1. Supporting developers who propose exceeding the thermal efficiency or water conservation standards required by law for new buildings or extensions, at the time of the application. In the case of larger developments such as housing estates the Council will support measures such as 'communal' <del>micro</del> -renewables, or District Heating installations.	For clarity in response to LPS242. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM31	92	Para 8.20	Groundwater is a vital resource supplying about a third of the Country's drinking water, however is often under threat from development pressures. In order to protect the quality of this water resource the policy also sets out expectations concerning risk assessments and mitigation strategies with schemes. Other Policy requirements continue to apply, eg SD5, with regards SuDS requirements, green infrastructure etc. <u>More detailed guidance regarding groundwater mitigation strategies etc is available in the Groundwater Protection Guides at Gov.uk (or any subsequent iteration of guidance on development in Groundwater Protection Zones). Early consultation with the Environment Agency and the relevant water company is also encouraged.</u>	For clarity in response to LPS190. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM32	92	SD4 Pollution and Water Quality	Amend 2 <sup>nd</sup> para:  When considering planning applications, the Council will require developers to have regard to the actions and objectives of all relevant River Basin Management Plans and related Plans affecting the District in striving to protect and improve the quality and capacity of water bodies in or adjacent to the District. Planning permission shall only be granted where the proposal makes provision for the protection (and where feasible, enhancement) <del>for</del> <u>of</u> water quality and waterside habitat, and water resources where applicable.	Grammatical correction.
AM33	93	8.21	The Moorlands has a wet climate and within it there are significant corridors along rivers identified as being within flood risk zones, in addition to other areas affected by surface water run off. Previous consultations have indicated acute public concerns <del>to</del> <u>about</u> flooding generally. Development patterns can have distorting effects on the water cycle and drainage systems (for example, artificial features	Grammatical correction.

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			such as hardstanding, new roads and pavements can create channels of surface run-off). Further, Climate change can be seen to result in more flooding and more unpredictable weather patterns generally; and also water scarcity issues. Therefore the NPPF expects that all new development proposals should be planned to avoid increased vulnerability to the range of impacts arising from climate change in the longer term; which should include mitigation and adaptation measures for the increased risk.	
AM34	93	Para 8.22	The District Council will continue to keep abreast of relevant evidence affecting flood risk in its District, such as the requirements of the Flood & Water Management Act 2010, Humber River Basin District Management Plan, Staffordshire Local Flood Risk Management Strategy, Water Framework Directive and any other relevant Catchment Flood Management Plans. A level 1 Strategic Flood Risk Assessment has been undertaken for the District. In accordance with the NPPF, areas of 'low', 'medium' and 'high' risk have been mapped using data collected from the Environment Agency ( <u>EA</u> ), Staffordshire Moorlands District Council, Severn Trent Water, United Utilities, the Highways Agency and British Waterways. This has included information on flooding from rivers, surface water (land drainage), groundwater, artificial water bodies and sewers. This provides the basis for the Sequential Test to be applied. The Council will expect the Sequential Test to be applied to all sites within the 'high' and 'medium' risk flood zones to demonstrate that there are no reasonably available sites in areas with less risk of flooding that would be appropriate to the type of development or land use proposed. If there is an area of overlap between the site boundary and area at risk of flooding, this should be utilised as an opportunity to reduce flood risk within the site, by using waterside areas for recreation, amenity and environmental purposes. Where sites are affected by the presence of any type of watercourse, the Council will expect developers to undertake early discussions with the <del>Environment Agency</del> <u>EA</u> and the Lead Local Flood Authority ( <u>LLFA</u> ). The NPPF provides guidance on the types of development which require the submission of a site-specific flood risk assessment; which should demonstrate that the development has been designed to be flood resilient and resistant and safe for its users for the lifetime of the development; that the development will not increase flood risk elsewhere and, wherever possible, will reduce overall flood risk.	To explain abbreviated terms used later on in the Plan text in response to inspector's preliminary questions.
AM35	94	Para 8.24	Where possible, watercourses should not be culverted, as this can impede water flows and worsen flooding. Culverting also impacts on the ecological health of the watercourse. Proposals for culverting a watercourse may trigger a <u>Water</u>	To explain abbreviated terms used in the Plan text; and grammatical correction, in

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			Framework Directive (WFD) assessment. Crossings of water courses should be made where possible by a bank top to bank top bridge system in preference to culverts. <u>The Council expects developers to explore how existing culverted watercourses on site can be 'opened up' to alleviate flood risk, create and improve habitat and develop green corridors. Where this is not possible for larger, deeper culverts, an assessment of its structural integrity should be made, with any remedial actions taken prior to the development of the site. In addition, a maintenance regime should be agreed to reduce the likelihood of blockage.</u>	response to inspector's preliminary questions.
AM36	94	Para 8.25	<p>Amend policy as follows:</p> <p><del>This Policy SD5</del> is designed to limit the impact of surface water flooding from new development. The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. Applicants should target a reduction in surface water discharge in accordance with DEFRA and LLFA guidance. Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. On previously developed (brownfield) sites the aim should be to reduce runoff rates and volumes. On greenfield sites the aim should be to ensure that there is no increase in the rate and volume of surface water runoff. Surface water from new development should be discharged in the following order of priority:</p> <ol style="list-style-type: none"> <li>1. An adequate soakaway or some other form of Sustainable Drainage System (eg pond,swale,wetland etc).</li> <li>2. An attenuated discharge to watercourse.</li> <li>3. An attenuated discharge to public surface water sewer <u>or highway drain</u>.</li> <li>4. An attenuated discharge to public combined sewer.</li> </ol>	<p>For clarity in response to inspector's preliminary questions.</p> <p>For clarity in response to LPS186. (Schedule of Additional Modifications 31<sup>st</sup> May 2018)</p>
AM37	95	Para 8.26	<del>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available.</del> Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On larger sites drainage proposals should be part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction; the Council will encourage applicants to engage in early discussion with utility providers and LLFA for this purpose.	To delete repetition from para 8.25.

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AM38	95	Para 8.27	<p>Notwithstanding any requirements for site-specific flood risk assessments, new legislation (2010 Flood and Water Management Act) may require separate Sustainable Drainage approval from the SuDS-approving authority (in all locations) for most new developments. In December 2014, a written ministerial statement by Eric Pickles MP clarified that the Government expects Planning Authorities to ensure that sustainable drainage systems for the management of run-off are put in place for all 'major'-scale developments, unless demonstrated to be inappropriate; and that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. SuDS can include permeable surfaces, green roofs, filter strips and swales, infiltration devices and basins or ponds. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management. The preference will be for new development to include genuine sustainable drainage systems as opposed to underground tanked storage for surface water. Applicants should also consider how the landscaping of a site can contribute to surface water discharge (hard and soft landscaping, permeable surfaces etc). Development proposals should include an indicative drainage strategy to demonstrate how sustainable drainage will be incorporated into the development. The strategy should include sustainable drainage elements with attenuation, storage and treatment capacities incorporated as set out in (updated) national design guidance. Applicants will also be expected to review any guidance issued by the County Council Lead Local Flood Risk Officer or Environment Agency, with regards to SuDS design expectations, as appropriate including Staffordshire County Council's February 2017 'SuDS Handbook' ;and the SCC SuDS information page for developers at <a href="https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx">https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx</a> . Additionally as the Moorlands is hilly, developers should also consider the issue of 'peri-urban flooding' in their surface water/SuDS strategies: where water on land uphill of a site 'sheds off' down into the development. The <del>Updated Flood Map for Surface Water</del> <u>Risk of Flooding from Surface Water map</u> gives a good indication of where problems might arise and developers should consider this potential risk carefully in hilly areas of the District such as Biddulph and Leek. Early pre-application consultation with the LLFA on these risks is advised.</p>	<p>Insertion of hyperlink to SCC 'Information for Planners and Developers' webpage in response to LPS229.</p> <p>Clarification that the 'Updated Map for Surface Water' has been superseded by the 'Risk of Flooding from Surface Water map' (LPS253).</p> <p>(Schedule of Additional Modifications 31<sup>st</sup> May 2018)</p>
AM39	97	Para 8.28	<p>The provision of employment land of the right type and in the right place is a key issue for the Local Plan. The Employment Land Study has highlighted the need for the local economy to rely less on the manufacturing industry and to stimulate</p>	<p>For clarity.</p>

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			the private sector by making more sites available. The Study particularly indicated the need for starter units and the potential for offices. Tourism and cultural development is also seen in the Employment Land Study as being potentially significant for the District's economy in terms of generating income and providing employment. This section therefore contains 5 policies to help develop the District's economy and maintain existing valuable employment land and premises. <del>Note that</del> The allocation of Blythe Vale for mixed uses under Policy DSR1 responds to a unique set of circumstances as it is of regional-scale; a more flexible approach to mixed uses is advocated under Policy DSR1 than in <del>this Policy E1.</del>	
AM40	100	Para 8.35	This 27ha is then broken down into the three towns and rural areas, according to the proportions set out in Strategic Policies SS3 and SS4. The Council therefore makes the following allocations for B Class employment use. <del>Note that</del> whilst the ELRS update 2017 tentatively recommends a 'split' of this figure (50% for B1a/B1b office, 50% for B1c/B2 industrial/B8 storage and distribution); the Policy does not specify sub-uses so as to maximise the freedom of subsequent occupants. However Policy SS4 carries forward the ELRS update expectations about splits between B-uses. The Council will need to monitor the uptake of the respective sub-uses to assess how effectively employment land is being delivered across the District. Land requirements are expressed as a minimum.	For clarity.
AM41	101	Para 8.36	<del>Note that</del> As in May 2016 the Council granted outline approval for a major residential and industrial scheme in the countryside at Cresswell with the industrial element covering approx 8.58ha (satisfying the District's residual employment land requirement 2016-2031) there is only one employment allocation within the rural areas. This is site WA004 which, although amounting to around 1.66ha in total, includes an existing 0.44ha industrial estate to which any development schemes across the wider site would have to demonstrate (at least) the protection or re-provision of this area, under Policy E3. <del>Note that,</del> As in the Core Strategy, due to the regional scale of the 48.5ha allocation of land at Blythe Vale (Policy DSR1) for mixed uses, employment development will be considered independently of the general employment land requirements for the District set out in Policy E2.	For clarity
AM42	102	Para 8.38	Amend first sentence:  The Council will continue to resist proposals involving the loss of employment	In response to the Inspector's preliminary comments that whilst employment land was

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			land <del>or employment use</del> (as defined in the Glossary) by proposing a sequential approach towards planning applications.	defined in the Glossary and linked to this Policy, 'employment uses' was not. To clarify that Policy covers both employment land and employment uses.
AM43	104	Para 8.42	<del>This Policy E4</del> positively supports the important role that tourism and culture plays in the economy of the Staffordshire Moorlands and the contribution it makes to increasing physical activity and improving health and well-being. The District benefits from natural attributes including its landscapes, the Churnet River etc alongside man-made features including industrial heritage; prominent examples being the Caldron Canal; heritage railway system, reservoirs such as Rudyard and Tittesworth, and quarry workings. It is essential however that all new tourism, visitor and cultural proposals that are located outside settlement boundaries should be in sustainable locations and carefully assessed so that they do not have a detrimental impact on the local area unless it can be demonstrated that a particular tourism proposal requires such a location. The policy also accords with the Strategic Policies and tourism policy for the Churnet Valley (Policy SS11) which seeks to promote the Churnet Valley as a sustainable tourism and recreational resource.	For clarity.
AM44	105	Para 8.43	Existing tourist accommodation in the Staffordshire Moorlands is generally small scale family-run businesses, usually rurally located, often in converted buildings. The area has a relatively high proportion of self-catering types of accommodation and very few hotels and serviced accommodation. <u>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.</u> Within the Churnet Valley the provision of further short and long stay visitor accommodation is particularly supported, the Churnet Valley Masterplan provides further guidance on suitable sites and scale. Particular attention should be paid to the quality of new tourist accommodation. A Staffordshire Moorlands Tourism Study undertaken in 2011 has identified a number of projects that would enhance the tourism offer of the District. These include developing and improving attractions and attractors, and enhancing the accommodation stock, notably further small serviced and self catering accommodation, particularly in the Churnet Valley, and providing budget hotel accommodation in the market towns. Tourism also plays an important role in diversifying the rural economy. The Tourism Study identifies	For clarity in response to inspector's preliminary questions.

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			where there is scope for further provision and the nature of that provision which will help inform decisions on applications for tourism uses in order to ensure supply matches demand. Policy E4 sets out the considerations for tourism proposals.	
AM45	105	Para 8.44	Within town centres new tourism, visitor and cultural facilities and accommodation should accord with Policy TCR1. Outside settlement boundaries (beyond areas with good connectivity with other tourist destinations and amenities), and in areas not identified for tourism development in the Churnet Valley Masterplan or other relevant documents, <u>proposals for new tourist, visitor and cultural accommodation and facilities will be limited to the conversion of existing buildings and in exceptional circumstances new buildings will need to justify their location as well as the need for the facility.</u> <u>Sites Proposals</u> for touring caravans and camping sites will <u>be granted providing they meet the criteria set out in</u> also need to satisfy the terms of the policy. Stronger controls will however apply across the Green Belt, including those parts of the Churnet Valley which are within it, in order to preserve their openness.	Council agrees to amend this para to remove inaccurate reference to rural building conversions. Also the reference to caravans and camping sites relates to an earlier version of the Plan and needs to be updated. (In response to inspector's preliminary questions). Also textual amendments to reflect main modifications to Policy E4 (MM20).
AM46	107	8.46	<u>Policy H1</u> <del>This policy</del> seeks to ensure that an appropriate range and type of housing is provided which meets identified needs arising from changes in population structure, including special needs <u>for the elderly of an ageing population</u> , and promotes higher quality....	To improve clarity in response to Inspector's minor queries and typos and for clarification in response to LPS236 (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM47	107	8.47	This policy <del>is primarily to</del> <u>also ensures</u> that <del>an appropriate range and mix of</del> housing, including affordable housing – is provided to meet the needs of the existing and future population. It reflects government guidance .....	To improve clarity in response to Inspector's minor queries and typos
AM48	107	8.49	Housing for special groups will also be needed to meet the future increase in elderly persons across the District and the needs of those with a learning or physical disability – this may be in the form of sheltered housing, extra care homes <del>or flexicare</del> or supported housing.	To reflect outdated strategy in response to LPS237. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM49	111	8.54	In order to meet the housing requirement outlined in Policy SS3 and Policy SS4, the <del>above</del> sites <u>below</u> have been identified as suitable for development. In some cases this will be housing but in others the site may be more suitable for a mix of uses.	For clarity.
AM50	114	8.59	In the rural areas it is anticipated that the bulk of the provision of affordable	To clarify that affordable



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			houses will be in the larger villages, either on allocated sites or on windfall sites. Because of the smaller scale of development in the rural areas a lower threshold is considered justifiable unless there are exceptional circumstances why this would not be possible, such as enabling development. <u>The approach established at Paragraph 7.30 of housing completions within the Peak District National Park and within the District counting towards Local Plan housing figures also relates to affordable housing. Applications for affordable housing may arise within the relevant parts of the National Park in the type of locations that would not normally be supported by Local Plan policy. However, for the avoidance of doubt, applications for affordable housing within the Peak District National Park will be determined in accordance with the Development Plan for the National Park including any relevant Neighbourhood Plans. These plans may identify opportunities for affordable housing provision that would contribute towards the needs of the District.</u>	housing may also come forward within the National Park which would contribute towards the needs of the District in response to LPS31. (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM51	115	8.62	This policy is based on the 2015 'Planning Policy for Traveller Sites' <del>Guidance</del> and wider NPPG, which seek to address this through criteria aimed at ensuring such provision is made in appropriate locations which will apply to the determination of planning applications. This policy also relates to travelling showpeople. Although their work is of a mobile nature, showpeople nevertheless require secure, permanent bases for the storage of their equipment and more particularly for residential purposes.	For clarity.
AM52	123	8.75	All developers and applicants will be required to provide a Design and Access Statement to accompany suitable planning applications ( <u>refer to <a href="http://www.legislation.gov.uk/uksi/2015/595/article/9/made">http://www.legislation.gov.uk/uksi/2015/595/article/9/made</a></u> ) which addresses, as appropriate, the issues set out in Policy DC1 and the Design Guide SPD.	For clarity in response to the Inspector's preliminary questions.
AM52	126	8.83	The NPPF uses the term 'heritage asset' which can be designated or non-designated. Examples of these are Scheduled Monuments, Listed Buildings, Historic Farmsteads, Conservation Areas, Registered Parks and Gardens, Registered Battlefields, <u>and</u> archaeological remains. There are just under 1,000 Listed Buildings and structures, 16 Conservation Areas (as at September 2017) and a number of Scheduled Monuments within the District outside the Peak District National Park. Conservation Areas and Listed Buildings are protected by national legislation and guidance. Additionally the Council has adopted an SPD 'Staffordshire Moorlands Local Heritage Register' which outlines procedures for identifying local buildings not statutorily protected but considered worthy of recognition (local listing). In addition, Government Guidance (NPPF) requires the	For clarity in response to the Inspector's preliminary questions.

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			Council to consider any impacts arising from a development proposal on non-designated heritage assets.	
AM53	127	8.85	Add new sentence to end of paragraph: <u>The Council has been working pro-actively with the owners of Big Mill in Leek in order to encourage re-development of the mill which would ensure that it does not remain a building at risk.</u>	For clarification (in response to LPS290). (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM54	127	New paragraph between 8.85 and 8.86	<u>Work is being undertaken by the Council to monitor and reduce the number of buildings at risk in the District:</u> <ul style="list-style-type: none"> <li><u>A recent BAR survey revealed that a number of listed funerary monuments are at risk (21 of these structures - 11 Listed Building entries). The Moorlands Partnership Board (funded by SMDC) has allocated £10,000 towards the repair of these and removal from the local BAR register.</u></li> <li><u>In 2013, the Council took part in the pilot scheme funded by (what was then) English Heritage looking at innovative ways of recording heritage at risk using non-professional volunteers. The local project, known as 'Counting our Heritage' was undertaken jointly with High Peak Borough Council and proved to be a success. Both Councils are looking at how this approach can be repeated using volunteers coupled with hand-held technology to simplify how the emerging data is processed.</u></li> </ul>	For clarification (in response to LPS290). (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)
AM55	127	8.90	The policy requires applicants to submit a heritage statement in order for the Authority to understand the potential impact of the proposed works on the significance of a heritage asset and its setting, and to justify that impact. The Council would expect to see an assessment of how the application/proposal will affect the significance of a heritage asset, including its setting and what mitigation/ enhancement measures may be needed to overcome any potential harm. This should refer to the <u>Historic Environment Record (HER)</u> in the first instance, and any other documents such as listing, conservation area appraisals, historic landscape characterization etc. This should be carried out by an appropriate qualified professional and may require detailed supporting documents such as historic phasing plans, photographic survey, structural survey, detailed analysis of views and setting or archeological field evaluation. To assess impact, detailed drawings will be required and photomontages can be particularly useful to demonstrate the impact of a new development on the asset and its setting. Further useful information such as <u>Good Practice Advice Notes (GPA) 2 and 3</u> and Conservation Principles, as well as the variety of Historic Environment Advice	To explain abbreviated terms used in the Plan text in response to inspector's preliminary questions.

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			Notes (HEAN's) (of which the Heritage Statement will be one) can be found on the Historic England website.	
AM56	129	8.93	<del>This Policy DC3</del> provides protection for local landscape character which includes features, qualities and views that can make a valuable contribution to the landscape quality. This will be achieved through resisting development that would have a detrimental impact on landscape features, qualities and views.	For clarification in response to inspector's preliminary questions.
AM57	135	8.105 – 8.109	<p>8.105 It is acknowledged that due to housing growth and increasing population, some schools may be required to expand, potentially onto playing pitch land. Where this is the case, it is imperative that the schools in question are left with sufficient playing field and playing pitch land to deliver curricular and extra-curricular needs <u>as well as any community use arrangements</u>. The Playing Pitch Strategy (2017) advises that if the schools curricular and extra-curricular needs can continue to be met despite the expansion, mitigation for the loss of the playing pitch land is still required, given the shortfalls identified.</p> <p>8.106 <u>Replacement of school playing field, including costs and new provision that is lost as a result of school expansion should be borne by the developers, from those developments directly linked to school expansion. Where developers are required to make education based contributions (for school places), those developers may also be required to make additional financial contributions through section 106 agreements to mitigate for the for future loss of school playing fields impacted by school those school expansions.</u></p> <p>8.107 <u>Where part of a playing pitch is lost from school expansion, it may be the case that the requirement for replacement provision will be greater than the equivalent land lost and equal to that of the whole playing pitch that has been impacted by the development. This is to say that the loss of part of a playing pitch may render the whole pitch area as having being "lost" to its playing purpose and a requirement for equal replacement of that pitch may be required under the advice of the 2017 Playing Pitch Strategy. These potential losses will be considered in the round so that they can be dealt with on a strategic basis as part of the Council's District-wide Action Plan.</u></p>	For clarification in response to SCC (LPS214). (Schedule of Additional Modifications 31 <sup>st</sup> May 2018)

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			8.108 Where like for like replacement of school playing field or playing pitches as a result of development is not practicable, financial contributions may be sought for alternative sport and recreation provision. This should therefore be covered via developer contributions from the housing allocations, with a mitigation package agreed upon by all stakeholders, including Sport England. <del>on a site-by-site and development-by-development basis.</del> The Council's Playing Pitch Strategy action plans and Strategy for Physical Activity and Sport will take into account these potential losses as part of its District-wide Action Plan.	
AM58	137	8.106	Green Infrastructure is the network of green spaces and natural elements that <del>intersperse</del> <u>lie within</u> and connect our towns, villages and countryside. It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside.	Textual amendment in response to inspector's preliminary questions.
AM59	140	8.114	The Staffordshire Moorlands Biodiversity Opportunity Map has been produced by Staffordshire Wildlife Trust in conjunction with other nature conservation bodies <del>which to</del> highlights areas of biodiversity importance. <del>This and other evidence has contributed to the preparation of a Strategic Green Infrastructure 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. The Map and associated objectives are published as part of the Council's Green Infrastructure Strategy.</del>	To ensure clarity regarding the publication in which the Staffordshire Moorlands Biodiversity Opportunity Map may be viewed and in response to the Inspector's preliminary questions.
AM60	144 /147	Para 8.125 / para 8.134	Amend para 8.125:  It is considered that there is potential in influencing modal shift away from the car in Staffordshire Moorlands in two respects - by targeting public transport improvements along the main corridors connecting the Moorlands with the Stoke-on-Trent conurbation; and by promoting walking, cycling and public transport within and between local settlements. <u>This will also help to support healthy, inclusive and sustainable communities as well as reducing the impacts of travel.</u> The Council's Development Capacity Studies have examined the accessibility of the main settlements in the District using the existing transport network including public transport and this has informed the development approach and identification of development areas. However, it is important that strategic planning decisions are not purely based on the location of existing sustainable transport infrastructure. For this reason the proposed policies are proactive in	To avoid duplicatory text contained in both paras (in response to the Inspector's preliminary questions).

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			seeking improvements to the existing network.  Delete para 8.134.	
AM61	151	9.4	A track in <del>SCC</del> ownership of <u>Churnet View Middle School</u> running to Wardle Barn Farm separates the <del>Churnet View</del> School from the Horsecroft Farm site. SCC Highways have indicated that access via this track is acceptable through the Nightingale Estate (Tittesworth Avenue), subject to access design. It is feasible that a mixed use scheme could be accessed either via the current <del>SCC school</del> track; or using land at Horsecroft Farm instead. The Council would also view favourably proposals that consolidate the additional school land with the current school site, and consideration should be given to new alignment of this track to accommodate this.	Factual correction
AM62	151	Para 9.8	The Extended Phase 1 Habitat Surveys and Local Wildlife Assessments also recommend a number of ecological surveys are undertaken (including survey of the peripheral hedgerow habitat to establish potential SBI ( <u>Site of Biological Importance</u> )/BAS ( <u>Biodiversity Alert Site</u> ) status) and that any vegetation is removed at the appropriate time of year.	To explain abbreviated terms used in the Plan text in response to inspector's preliminary questions.
AM63	151-184	All policies in Chapter 9	Addition of SHLAA references to site policy titles:  Policy DSL 1 <b>Land at Horsecroft Farm, Leek (<u>ADD01</u>)</b>  Policy DSL 2 <b>Land at The Mount, Leek (<u>LE066, LE128a&amp;b, LE140, LE142a, LE142b</u>)</b>  Policy DSL 3 <b>Land at Newton House, Leek (<u>LE150</u>)</b>  Policy DSL4 <b>Cornhill East, Leek (<u>LE235</u>)</b>  Policy DSC1 <b>Cheadle North Strategic Development Area (<u>CH001 &amp; CH132</u>)</b>  Policy DSC2 <b>Cecilly Brook Strategic Development Area (<u>CH002a, CH002b, CH024</u>)</b>	For clarity in response to the Inspector's Preliminary Questions.

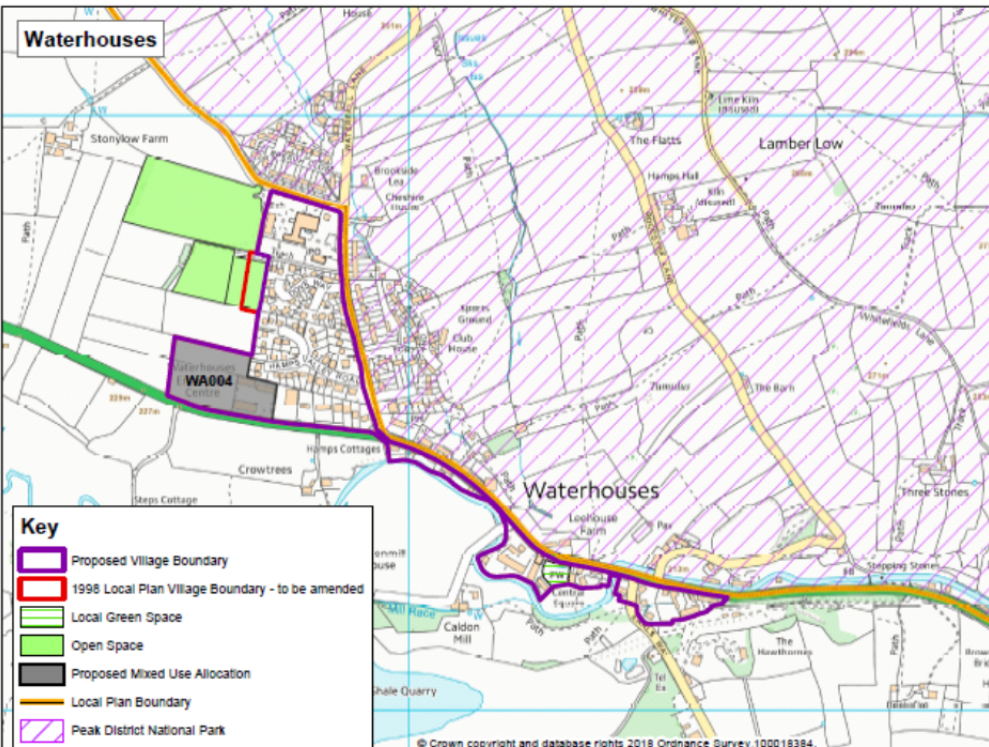
Mod No.	Page	Para/Policy Number	Proposed Modification (deleted text has <del>strikethrough</del> , new text is <u>underlined</u> )	Reason
			<p>Policy DSC3  <del>Mobberley Farm, Cheadle</del> <u>Strategic Development Area (CH085a, CH085b, CH085c, CH085d, CH128)</u></p> <p>Policy DSC4  <u>Land North of New Haden Road, Cheadle (EM1)</u></p> <p>Policy DSR1  <u>Blythe Vale</u></p> <p>Policy DSR2  <u>Land east of Brooklands Way, Leekbrook (EM2)</u></p> <p>Policy DSR3  <u>Land west of Basford Lane, Leekbrook (ADD09)</u></p> <p>Policy DSR4  <u>Land off Ash Bank Road Werrington (WE003 &amp; WE052)</u></p>	
AM64	158	9.35	Housing density calculations are set out as gross figures and vary across the site with 40 dwellings per hectare assumed for the area between the bypass and Tunstall Road to reflect adjacent development and its position close to the town centre, 35 dwellings per hectare assumed for land west of the Biddulph Valley Way (BVW) and a lower density of less than 30 dwellings per hectare assumed for the central part of the site to reflect known constraints including mine shafts, land levels and the watercourse. Actual density levels will be determined through the masterplan process once all the constraints can be assessed in full detail.	To explain abbreviated terms used in the Plan text in response to inspector's preliminary questions.
AM65	160	9.39	Additional wording at the end of the paragraph: <u>As the site is likely to be developed in phases, any parts of the site not affected by mining legacy could be commenced earlier than those which require detailed investigations (subject to policy objectives been met and delivery of the wider development area not being undermined).</u>	For clarification in response to LPS299. (Schedule of Additional Modifications 31st May 2018)
AM66	160	9.43	There is ecological interest on the site and comprehensive survey work will need to be carried out at an early stage. Recommendations for survey work are set out in the Council's 2015 Phase 1 Habitat Survey and its 2016 Local Wildlife	To explain abbreviated terms used in the Plan text in response to inspector's

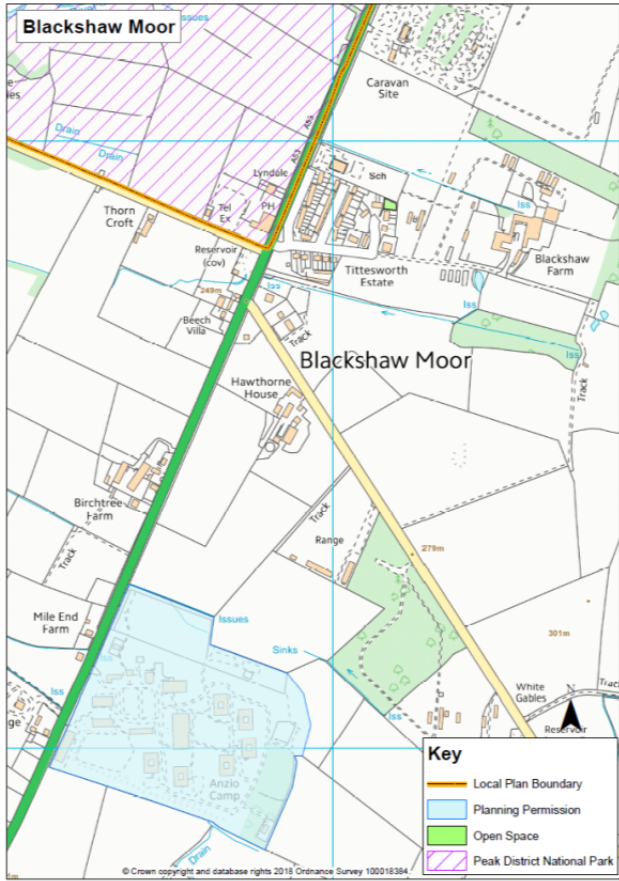
Mod No.	Page	Para/Policy Number	Proposed Modification (deleted text has strikethrough, new text is underlined)	Reason
			Assessment work (for land between the bypass and the Biddulph Valley Way as well as land at Beehive Farm). Recommendations for land to the west of the Biddulph Valley Way can be found in the Extended Phase 1 Habitat Survey (September 2017) along with land between Beehive Farm and the roundabout. All of this survey work must be undertaken. This includes a bat survey for all buildings and trees with potential to support roosting bats, a reptile survey, a hedgerow survey following modified HEGS ( <u>Hedgerow Evaluation and Grading System</u> ) methodology, vegetation removal at the appropriate time of the year, assessment of the trees for location, quantity, age and size and a detailed vegetation survey to determine the status of the habitat mosaic, particularly in the central part of the site, sensitive mowing regime of grassland and leaving rough margins, hedgerow planting of native woody species and management during winter, PSYM pond survey, presence / absence survey for great crested newts and removal of Himalayan balsam. All the surveys listed are not required on every part of the site. The developer should refer to the Ecology Studies to identify which parts of the site require which type of survey. This work will also establish the SBI / BAS status of parts of the site.	preliminary questions.
AM67	161	9.47	Additional wording at the end of the paragraph: <u>As the site is likely to be developed in phases, following the masterplanning process, early applications for development on part of the site that would make a positive contribution to the policy objectives and facilitate the delivery of the wider development area would be acceptable.</u>	For clarification in response to LPS299. (Schedule of Additional Modifications 31st May 2018)
AM68	163	9.51	Re-phrase the first sentence of paragraph 9.51 to read: <del>There may be ecological interest on the site. and survey work will need to be carried out at an early stage to determine this.</del> Recommendations for survey work are set out in the Council's 2015 Phase 1 Habitat Survey. <del>No Local Wildlife Survey is necessary as the site is predominantly hard standing.</del> All of <del>the</del> <u>this</u> survey work must be undertaken. This includes a bat survey regime to ascertain whether bats roost in the buildings and vegetation removal at the appropriate time of year.	For clarity in response to the Inspector's preliminary questions.
AM69	163	9.52	Remove the final sentence from paragraph 9.52: <del>"For garages to be counted towards parking provision they must have minimum internal dimensions of 3m x 6m".</del>	Removal of unnecessary detail in response to the Inspector's preliminary questions.
AM70	165	9.58	There are no designated heritage assets within the 400m buffer, according to the study and development would be highly unlikely to adversely affect the HLC	To explain abbreviated terms used in the Plan text in

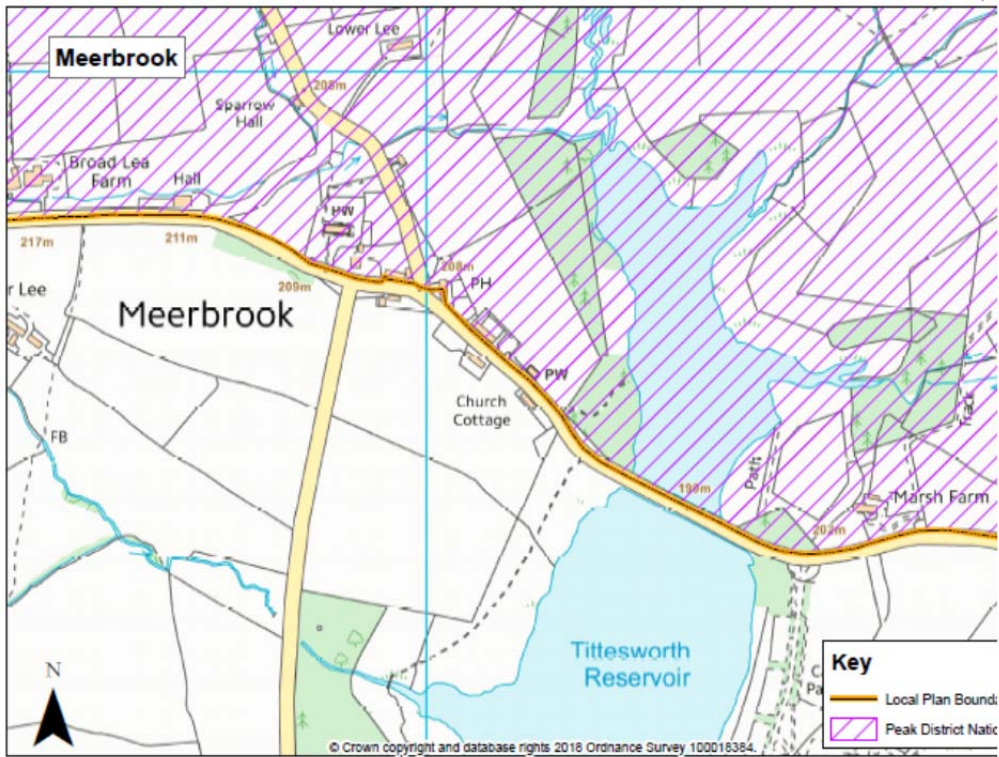
Mod No.	Page	Para/Policy Number	Proposed Modification (deleted text has strikethrough, new text is underlined)	Reason
			(Historic Landscape Characterisation) zone BBHECZ 5 ( <u>Biddulph and Biddulph Moor Historic Environment Character Zone 5</u> ) (Historic Environment Character Assessment 2010).	response to inspector's preliminary questions.
AM71	165	9.59	Remove the final sentence from paragraph 9.59: " <del>For garages to be counted towards parking provision they must have minimum internal dimensions of 3m x 6m</del> ".	Removal of unnecessary detail in response to the Inspector's preliminary questions.
AM72	165	9.60	Re-phrase the first sentence of paragraph 9.60 to read: " <del>Natural England have pointed out that a number of sites are</del> <u>This site</u> <del>located close to and / or adjoining existing areas of open space and green infrastructure</del> and will need to include suitable multi-functional green infrastructure <u>within the development scheme to provide links to the existing open space.</u>	For clarity in response to the Inspector's preliminary questions.
AM73	171	9.84	There will be a need to ensure that <del>the link road does not</del> <u>roads within the site do not</u> impact on the River Tean and its floodplain to increase flood risk elsewhere.	For clarification in response to LPS80. (Schedule of Additional Modifications 31st May 2018)
AM74	172	9.85	There are two Grade II Listed Buildings within 400m of the southern section of the site, as a farm the agricultural setting is considered to contribute to the overall significance of the asset. It is considered that mitigation through screening of the southern edge of the site would reduce those effects <del>however the comprehensive masterplan for the site should avoid harm in heritage terms before mitigation is considered.</del> The development access road has also been assessed as part of a wider link road in the Heritage Impact Study.	For clarification (in response to LPS296). (Schedule of Additional Modifications 31st May 2018)
AM75	178	9.109	The Council's Landscape, Local Green Space and Heritage Impact Study identifies a Listed building <u>Finneylane Farm</u> a short distance to the south and advises that despite intervening screening, development of the site would adversely affect its setting. It therefore recommends the site is only suitable for development in heritage terms, subject to suitable masterplanning and appropriate mitigation.	For clarity.
AM76	186	10.1	The Local Plan is required to set out how much development is intended to happen, where and when and by what means it will be delivered. To enable this to happen, the plan should be:  <ul style="list-style-type: none"> <li>• Capable of being delivered</li> <li>• Based on a partnership approach that helps to implement the aims and objectives of partner <u>organisations that benefit Staffordshire Moorlands</u></li> <li>• <del>organisations that benefit Staffordshire Moorlands</del></li> </ul>	To correct bullet spacing errors in response to the Inspector's preliminary questions.



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			<ul style="list-style-type: none"> <li>Flexible to reflect to changing circumstances, and have appropriate contingency measures <u>in place</u></li> <li><del>in place</del></li> <li>Easy to monitor to determine how well the strategy is performing against indicators and targets</li> </ul>	
AM77	186	10.2	The following <del>sections</del> <u>table</u> outlines how each of the policies of the Local Plan will be implemented how they will be monitored and how the necessary infrastructure needed to support planned development will be delivered.	Reflects deletion of Implementation table in response to the Inspector's preliminary questions.
AM78	186	10.3	It is important that the policies in the Local Plan are necessary and capable of being implemented, with clear mechanisms for doing so. The table below outlines how each of the policies will be implemented, <del>what their outcomes will be, how the policy will be implemented</del> and which organisations will be responsible or involved in doing so.	Reflects deletion of Implementation table in response to the Inspector's preliminary questions.
AM79	194	Policy DC2 'The Historic Environment'	Revise Principal Outcomes Column to read: Enhances and protects heritage assets <u>and their settings as well as</u> <del>and</del> the historic character of the area	For accuracy (in response to LPS298, LPS300). (Schedule of Additional Modifications 31st May 2018)
AM80	194	Policy DC2 'The Historic Environment'	Revise Implementation Mechanism Column to read: Determination of planning applications; <u>Proactive partnerships and strategic work;</u> s106 and conditions	For clarification (in response to LPS298) (Schedule of Additional Modifications 31st May 2018)
AM81	228-239	Appendix 4 Larger village maps [A4.1-A4.12]	Amend all Key boxes references from 'Proposed Village Boundary' to 'Proposed <u>Development</u> Boundary'.	To ensure consistency between the maps, Policy SS2, and other references throughout the Plan, in response to the Inspector's preliminary questions.
AM82	237	Map A4.10 Waterhouses	Update Policies Maps to identify local planning authorities on other side of Local Plan boundary.	For clarification in response to LPS32. (Schedule of Additional Modifications 31st May 2018)

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AM83	242	Map A5.2 Blackshaw Moor	Update Policies Maps to identify local planning authorities on other side of Local Plan boundary.	For clarification in response to LPS32. (Schedule of Additional Modifications 31st May 2018)

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AM84	260	Map A5.20 Meerbrook	Update Policies Maps to identify local planning authorities on other side of Local Plan boundary.	For clarification in response to LPS32. (Schedule of Additional Modifications 31st May 2018)

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AM85	300	Glossary	<ul style="list-style-type: none"> <li>Remove definition of 'Primary Shopping Area' from the glossary as this term is not used in the Local Plan.</li> <li><b>Primary and secondary Shopping Frontages</b> – Primary shopping frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. <del>Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.</del></li> </ul>	Removal of unnecessary wording in response to the Inspector's preliminary questions.
AM86	296	Glossary	<p>Amend "Employment Land":</p> <p><b>Employment Land/<u>Employment uses</u></b> – In the context of the Local Plan this includes authorised employment sites currently in use; disused/vacant sites</p>	In response to the Inspector's preliminary comments that whilst employment land was defined in the Glossary and

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			where authorised employment use has not been abandoned; and employment allocations (Policy E2) whether or not they contain development.	linked to this Policy, 'employment uses' was not. To clarify that Policy covers both employment land and employment uses.