

MATTER 6

Employment Policies (including town centres and tourism)

Issue 1 – Existing Employment Land and Sites

1.1 Will Policies SS4, E1 and E3 (as modified) provide sufficient flexibility to provide a range of employment uses on employment sites?

1.1.1 Yes. SS4 provides for use class splits in general (based on recommendations in the NLP study ED17.5). Pol E1 sets out a number of locations where (non-office) employment development – including sui generis – is supported. Even rural locations can be justified. Changes of use *between* employment uses classes are also generally appropriate (subject to amenity considerations). Pol E3 provides for the protection of existing employment sites (which has a wider meaning than just B class uses, so may include sui generis uses for example) and expects proposals involving employment floorspace loss to explore mixed use schemes first; but still provides flexibility for alternative uses.

1.2 Is Policy E3 consistent with paragraph 22 of the Framework and the long term protection of sites allocated or safeguarded for employment use?

The Policy is retained from the 2014 Core Strategy (ED32.7), which was found sound at the Core Strategy examination. It is considered the policy *does* provide for applications for alternative uses to be treated on their merits in paragraphs B) and C). These criteria allow the Council to test market signals, allowing the Council to implement paragraph 22.

1.3 Are the criteria within Policy E3 relating to loss of employment land too onerous?

See also responses to 1.1 and 1.2 above. It is not considered that E3 criteria are too onerous. The policy seeks to retain a finite number of existing employment sites as part of the District's supply, whilst allowing for testing of market signals as per para 22 NPPF. The Policy is retained (modified) from the Core Strategy (ED32.7), which was found sound at examination. The policy has a wider scope than the Core Strategy, in that wider 'employment' uses are protected, not just B uses. See for example Council response to LPPO2570 on page 474 of consultation statement appendix ED.5.2.

Issue 2 – Employment Development

2.1 Do the policies of the LP provide sufficient support for employment development within the District, specifically the rural areas (Policies E1 and the Area Strategy Policies in particular)?

See also 1.1 response above. Policy E1 provides for a number of locations where 'employment' uses (in the wider sense) are supported. The policy is predicated on the spatial strategy policies in that employment development should be sustainably located. Policy E1 and SS10 provide for rural employment development where location can be justified (including existing major developed areas); the employment redevelopment of *existing* rural employment sites; and the re-use of rural buildings irrespective of previous use. The Churnet Valley Masterplan identifies Bolton Copperworks and Anzio Camp as potential employment sites in the countryside.

Issue 3 – Main Town Centre Uses

3.1 Taking into account the above is the allocation of a site for a discount foodstore in Biddulph justified on qualitative grounds and will it be on the most sequentially preferable site?

3.1.1 Yes, the allocation is fully justified on qualitative grounds and will be located on the most sequentially preferable site.

3.1.2 It is best practice when assessing the need for retail floorspace to consider both quantitative and qualitative indicators. This is outlined in paragraph 161 of the 2012 version of the NPPF. No preference is given in national policy on plan-making to either indicator and they are to be treated equally. The evidence for the Biddulph allocation derives from the content and analysis in the 2013 Retail Study (ED25.1), supplemented by the retail impact thresholds review in late 2017 (ED25.3).

3.1.3 The 2013 Retail Study (ED25.1 p.104 para.11.7) indicates that following the opening of the new Sainsburys store in 2010, there remains a large amount of leakage of convenience goods expenditure from local catchment (Zone 9). In particular, the available survey evidence indicates significant outflows (c. 43%) of main food expenditure from the Biddulph catchment to foodstores in Congleton, Kidsgrove, Tunstall and Stoke-on-Trent. When top-up food shopping trips are also included, the evidence base information identifies that there remains significant outflows (c. 35% / £13.3m) of convenience expenditure from the Biddulph catchment to surrounding centres (Congleton and Stoke-on-Trent conurbation) (ED25.1 p.105 para.11.13).

3.1.4 Whilst there is no overriding quantitative need for a new mainstream foodstore in the town given the Sainsbury's store anchor, there is a clear qualitative need for a new medium sized foodstore for the town so as to provide additional competition and choice for local residents. The closure of the Co-Op and Somerfield stores (converted to mainly comparison goods stores) within the town centre has reduced local choice and a new store would provide a genuine alternative for local residents and lead to a lower proportion of trips being lost from the local area.

3.1.5 As indicated in the Council's response to the Inspector's Preliminary Questions (ED EL1.001b – p.24/25), Government policy, including the sequential test will form part of the master planning process.

3.2 Does the extent of the town centre boundaries for Leek, Biddulph and Cheadle reflect primary shopping frontages and the location of other town centre uses within and close to the town centres?

3.2.1 Yes, it does.

3.2.2 The proposed primary frontage for Leek, Cheadle and Biddulph stretches the length of the main shopping streets and is all within the proposed town centre boundaries (ED1.1 p.218, 222 and 226). The location of other town centre uses within and close to the town centre is also reflected in the boundary.

3.3 Is the proposal to draw the town centre boundaries more tightly than shown in the Retail Study (ED25.1) justified?

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- 3.3.1 Yes it is.
- 3.3.2 Boundaries in the Retail Study (ED25.1 – Appendix 6 p.211-213) were suggestions from the consultant based on information they had available to them “for the respective Council to consider” (ED25.1 p.125 para.13.3). Council officers had discussions about these boundaries internally with Regeneration colleagues and made some amendments (both inclusions and exclusions) which are explained in the Site Allocations Topic Papers - Leek (Evidence Document 13.1 pages 50-51 and 64); Biddulph (Evidence Document 13.2 pages 41-42, 53 and 60); and Cheadle (Evidence Document 13.3 pages 40-41 and 50).
- 3.3.3 Following committee agreement of the amended boundaries, they were the subject of several rounds of consultation prior to Submission (Site Options, Preferred Sites and Boundaries, Preferred Options) during which very little response was received.
- 3.4 Is Policy TCR2 clear as to how uses other than retail will be considered within primary frontages?**
- 3.4.1 Yes it is. The Council’s position is set out in its response to the Inspector’s Preliminary Questions (EL1.001b p. 26).
- 3.4.2 The Council annually monitors the percentage of retail and other types of units in each town centre as well as the percentage of vacant units within its town centres in order to help assess their vitality and viability and whether their retail function is being adequately protected (ED1.1 p.209).
- 3.5 Is the impact threshold of 200 m² within Policy TCR3 for town centre uses outside town centres justified?**
- 3.5.1 Yes, the threshold of 200sq m is supported by proportionate evidence and is justified in relation to key local circumstances.
- 3.5.2 Section 6 of the November 2017 retail impact thresholds review (ED25.3) provides the justification for the 200sq m impact assessment threshold. It provides an analysis which is in conformity with current national planning practice guidance ‘Ensuring the Vitality of Town Centres’ (see paragraph 016 Reference ID: 2b-016-20140306) including the examination of the recommended key indicators.
- 3.5.3 In particular, the recommended threshold draws upon a series of key characteristics of the main ‘town centres’, including: their small existing retail unit size, the size of the town centres overall, their current function and health, along with vulnerabilities in relation to different sizes and types of edge and out of centre retail development.
- 3.6 Would the threshold restrict the development of sustainably located local convenience stores?**
- 3.6.1 No. The imposition of a 200sq m impact assessment threshold is intended to act as protection for the on-going health and investment in defined ‘town centres’ in the local retail hierarchy and not as a bar to the provision of new modest sized local convenience stores. Convenience stores over 200sq m net which do not have a significant adverse impact upon the health of, and investment within, defined ‘town centres’ will be supported in principle.

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- 3.6.2 A 200sq m threshold for the application of the sequential test is considered an appropriate tipping point between small stores (under 200sq m net sales) which serve a very localised function, primarily within or close to residential areas, and larger stores (over 200sq m) which will draw from a wider catchment and thus are much more appropriately located in 'town centre' locations.
- 3.6.3 Moreover, the allowance for floorspace of up to 200sq m net sales without compliance with the sequential test is considered to allow a convenience store to stock a sufficiently wide range of goods to meet the day to day needs of local residents without being so large as to potentially impact upon the retail offer and performance of stores in defined 'town centres'.

Issue 4 – Tourism

4.1 Taking into account proposed modifications is Policy E4 justified and consistent with national policy?

Para 28 NPPF states Councils should support 'sustainable rural tourism' 'in appropriate locations'. Policy E4 builds on this setting out what the Council considers 'appropriate locations', whilst making allowance for developments in other locations where a rural location can be justified; and allowing for separate policy considerations in the Churnet Valley (Pol SS1). Both Pol E4 and SS11 were retained from predecessors in the Core Strategy (ED32.7), were found sound at Core Strategy examination.

4.2 Is Policy E4 too restrictive in favouring tourism development in locations with good connectivity or close to settlements?

Refer to 4.1 response above.

4.3 Does Policy SS11 (the Churnet Valley Strategy) provide sufficient support for:

- **Tourism related developments close to Churnet Valley; and,**
- **Sustainable transport modes?**

Page 79 of the SVLP provides a notional boundary for the Churnet Valley (retained from Core Strategy (ED32.7) and Churnet Valley Masterplan (ED32.3)) for development control purposes in determining whether Pol SS11 (and CVMP) would apply to proposals. For proposals deemed not to fall within Churnet Valley Pol E4 would continue to apply. The Churnet Valley Strategy applies to the Churnet Valley only. The Council is not aware of any references in national policy that requires a different approach. It is important to note that Pol SS11/CVMP (like Pol E4) is also predicated upon 'sustainable' tourism – not all tourism proposals in the CV are considered appropriate (with different component "character areas" behaving differing 'key actions' etc).

With regards sustainable transport modes note Pol SS11 refers to support for measures to *improve* connectivity, accessibility etc within/to the CV; and Pol E4 (which still applies in CV) supports proposals *capable of offering* good connectivity. See also Pols T1(2), T2, and C1.