

My Ref

Your Ref

9 November 2018

Mr Mark Dakeyne  
Planning Inspector  
c/o Programme Officer  
Moorlands House  
Leek  
Staffordshire  
ST13 6HQ

Dear Mr Dakeyne,

### **Staffordshire Moorlands Local Plan Examination – Actions for the Council**

I write to set out the Council's response to the agreed action points for week 1 and week 2 of the examination hearing sessions (EL6.001 and EL6.002). Each of the actions is listed below along with the Council's response. Where necessary, appendices to this letter are also submitted and referenced which provide more detailed information. Revised draft schedules of main and additional modifications also accompany this correspondence and are referenced accordingly.

#### **Week 1**

##### **Session 1 – Legal Compliance, Procedural Requirements and the Duty to Cooperate**

Provide a copy of webcast of Council Assembly 13 February 2018

A copy of the webcast was made available to the Inspector on 17/10/18.

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

Remove Policy SS1a.

Main modification to remove Policy SS1a included in the schedule of draft main modifications (MM2).

Provide revised maps of inset villages

The information is provided in Appendix 1. Development boundaries have not been defined for the smaller villages. Policy SS9 identifies the smaller villages. The maps

show the development boundaries of the towns and larger villages and the green belt. The Other Rural Areas defined in Policy SS10 comprises the countryside and green belt outside the development boundaries of the towns and larger villages and open countryside surrounding the smaller villages.

### **Session 3 – Housing and Employment Objectively Assessed Needs (OAN) and Requirements**

Provide note on implications on employment land of extending the plan period to 2033.

A note (table) is attached at Appendix 2 which demonstrates that applying a 2014-2033 employment land requirement from Lichfields study (EL.17.5) of **32ha**, deducting post-2014 completions to derive a net requirement, then deducting future employment land commitments across the District and employment allocations in the SVLP, leaves an under-provision of land allocations against the residual requirement in three areas (Leek/Leekbrook, Biddulph, Cheadle) and overprovision across the rural areas (excluding Leekbrook). Overall there is an under-provision across the District of approximately 1.463ha against the 32ha figure. However note that employment land supply in the SVLP does not factor in windfall allowances (unlike housing) so it is feasible that future supply could also derive from windfall in addition to allocations and existing commitments.

Provide details of planning applications/permissions on allocated sites to inform discussions during Week 2.

Details are provided in Appendix 10 to this letter.

Provide a note on how the Local Plan will deal with C2 housing.

Note submitted to Inspector on 22<sup>nd</sup> October (EL5.004).

### **Session 4 – Housing Land Supply**

Provide background information on windfall allowance.

This information is provided within Appendix 3.

Provide justification for large site windfall allowance in Leek.

This information is provided within Appendix 3 (see above).

Adjust the housing trajectory to remove windfall allowance for years 2018/19, 2019/20 and 2020/21 & taking into account a base date of 2014

This information is provided in Appendix 4.

Add PDNPA Topic Paper to the examination library. Provide details on completions in the Peak Park.

This information is provided within Appendix 5.

Provide a draft Housing Implementation Strategy

This is being prepared and will be submitted by the end of December.

Provide information on local delivery record/build out rates.

The table below lists recently complete sites, and illustrates lead in times compared to the grant of planning approval as well as annual delivery rates.

When compared to the assumptions in the Policy Topic Paper page 19 (Examination library 13.5) it shows that both the lead in times and delivery rates are in line with estimations.

The topic paper assumptions are that sites of less than 50, with full approval will commence in year 1 at a build out rate of 15pa.

For larger sites of up to 199 with full approval, delivery will commence in year 1 delivering 15 with an annual build out rate of 30pa

site	Number	Outline	PP granted	Under construction	Completed	Lead in time	Annual rate
Russell Grove	31	full	04/06/2015	24/02/2016	31/03/2018	8 months	15
Uplands Mill	197	09/02/2011	10/04/2012	21/07/2012	31/03/2018	3 months	33
Horsecroft Farm	35	full	13/09/2013	11/07/2014	02/12/2015	10 months	23
Bargate St	32	full	10/01/2015	22/10/2015	24/03/2017	9 months	22
Ambulance Station	11	full	26/07/2013	12/06/2014	31/03/2015	11 months	11
Portland mill	49	full	30/08/2017	31/03/2018		7 months	

In addition to sites within the District, St Modwen have a site currently under construction in Stoke. They have confirmed that the delivery rate is 49 per year and are confident that this can be replicated on the site within the District at Blythe Vale.

Provide information to support housing trajectory sites

This information is included in Appendix 4.

**Session 5 – Specific Housing Needs and Generic Housing Policies**

Add additional text to supporting text to Policy H1 to detail other relevant factors regarding housing mix local needs surveys / neighbourhood plans

Main modification to add additional supporting text to Policy H1 included in the schedule of draft main modifications (MM22).

Add additional text to supporting text to Policy H1 to refer to footnote to paragraph 46 NPPF 2018 regarding optional standards.

Main modification to add additional supporting text to Policy H1 included in the schedule of draft main modifications (MM22).

Remove “All” from policy H1 3d).

Main modification to amend text within Policy H1 included in the schedule of draft main modifications (MM22).

Amend H1 3b to refer to change emphasis on flexibility and refer to viability.

Main modification to amend text within Policy H1 included in the schedule of draft main modifications (MM22).

Change “and” to “or” in policy H1 5 (d).

Main modification to amend text within Policy H1 included in the schedule of draft main modifications (MM22).

Add reference to the Viability Study and zones in supporting text to policy H3.

Main modification to add additional supporting text to Policy H3 included in the schedule of draft main modifications (MM23).

Look at wording around ‘Exceptionally’ in the main modification to policy H3.

Main modification to amend text within Policy H3 included in the schedule of draft main modifications (MM23).

Provide details of affordable housing provision / Ascent programme / other initiatives

This information is provided in Appendix 6.

Add reference to residual requirement of 2 pitches in the Plan period to policy H4, and;

Paragraph 8.63 in main modifications clarify last sentence - people may be excluded from the PPTS/GTAA assessment but will be assessed under para 61 of the 2018 Framework.

Main modifications are included in the schedule of draft main modifications (MM24) to: clarify residual pitch requirements 2019-2034 in the policy (and link residual requirements generally with the subsequent assessment criteria); and clarify in the supporting text that non-travellers would still have their housing needs assessed under para 61 NPPF.

### **Session 6 – Employment Policies (including town centres and tourism)**

E3 clauses b) & c) to be followed by ‘and’ and not ‘or’ (MM). Restructure Policy to reflect this.

These changes have been made along with textual amendments to clarify that Part D would apply in the event that B) or C) applied [but not A)] in main modification MM20 in the schedule of draft main modifications.

Consider changing Cheadle town centre boundary to include Tape Street (& triangle) as per GVA recommendation

Main modification to amend the Cheadle Town Centre boundary included in the schedule of draft main modifications (MM60).

### **Session 7 – Generic Development Management Policies**

DC2 – Refer to proactive work on buildings at risk within policy.

Main modification to make reference to proactive work on buildings at risk within the policy included in the schedule of draft main modifications (MM28).

C2 – Review 11 dwelling threshold to 10 in the light of 2018 Framework. Similar for H3 – affordable housing

Main modification to amend text within Policy C2 included in the schedule of draft main modifications (MM32) and within Policy H3 included in the schedule of draft main modifications (MM23).

C2 – change ref from Open Space SPD to Developer Contributions SPD (AM).

Main modification to amend text within Policy C2 included in the schedule of draft main modifications (MM32).

**Week 2**

**Session 8 - Leek**

Amend MM39 to include a requirement to recognise the recreational value to the community of the Mount Road in the Masterplan and any proposals.

Main modifications are included in the schedule of draft main modifications MM37 to amend policy to require proposals to recognise the recreational value of The Mount for the community including pedestrians (and accompanying reference in the supporting text para 9.11). The supporting text now also references Sport England active design principles which are relevant.

Highways note for the Mount referring to SCC comments

In Leek Site Allocations Topic Paper (EL 13.1) refer to:

- proforma for The Mount (references to SCC Highways/ Transportation comments at pages 89/92/98); and
- proforma for LE066 Kniveden Hall (references to SCC Highways/ Transportation comments at pages 118).

See also Council MIQ response in EL2.053 page 3 'Highways and Transport' which summarises these issues [derived from Council responses to public consultation in EL5.2].

Note that part of Kniveden Lane is understood to be unadopted [beyond footpaths, between 52 Kniveden Lane and Mount Road junction to east].

Brooklands Way, Leekbrook –clarification of the availability of 3rd party land and access

Esterchem own the land which would be needed as the vehicular access to LEEK EM2. Confirmation of Esterchem's ownership of the relevant access land onto Brooklands Way in the Land Registry is attached at Appendix 7.b.

Esterchem Ltd are one of three landowners to benefit by application SMD/2014/0678 <http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=66254> and were notified under Certificate B of application form. Note they did not object to this application.

Simon W. Baker B.Ed MBA MIMSPA  
Chief Executive

Esterchem have been supportive of the scheme because they have expressed an interest in expanding onto the first (southwest plot). See letter from Adam Bray confirming this (Appendix 7.a); a number of the online application plans refer to Esterchem occupation of this plot.

For this reason Esterchem were also instrumental in seeking a diversion of a footpath bisecting this plot [to provide licensing and operational rationalisations on their subsequent occupation]. This is evidenced in paragraph 3.2 of the August 2017 planning committee report:

<https://democracy.staffsmoorlands.gov.uk/documents/s5003/13.%20Leekbrook%20Industrial%20Estate%20Footpath%20Committee%20Repor.pdf>

The proposal was endorsed by the committee:

<https://democracy.staffsmoorlands.gov.uk/ieListDocuments.aspx?CId=135&MId=808&Ver=4>

For your information, existing footpaths in Staffordshire can be viewed online:

<https://apps2.staffordshire.gov.uk/WEB/OnTheMap/RuralAccess> .

## **Session 9 – Biddulph**

### Add Core Strategy Inspector's Report to examination library

This document has been added to the examination library document reference EL5.002.

### Main Mod to show the reduction in size of allocation BD117

Main modification to show the reduction in size of BD117 is included in the schedule of draft main modifications (MM58).

## **Session 10 – Cheadle**

### DSC1 Amend trajectory to reflect comments from Persimmon 2019/2020 onwards

This information is provided within Appendix 4 – housing trajectory. (See line 60, Cheadle North)

DSC2 Amend MM50 to remove the need for a joint masterplan

Main modification to amend text within Policy DSC2 included in the schedule of draft main modifications (MM44).

Review Open Space designation at Friars Court / Cheadle Park Wood to exclude private land

Main modification to amend open space designation included in the schedule of draft main modifications (MM59).

Check town boundary at Thorley Drive reflects planning permission

The town boundary is considered to accurately reflect the planning approval at Thorley Drive. No amendment is proposed.

Put the updated Staffordshire Moorlands District Integrated Transport Strategy (SCC) in the examination library

This document has been added to the examination library ref EL5.003.

## **Session 11 – Rural Areas**

Site Plan of Blythe Vale showing the planning permissions (full, outline) and position of the access road

This information is provided in Appendix 8a and 8b.

Add the delivery rate from the St Modwen site in stoke to the delivery rate note / trajectory

See section above and Appendix 4

Review extent of allocation at Werrington (WE003 & WE052) to consider inclusion of existing land in prison grounds as options for access

Main modification to amend site boundary included in the schedule of draft main modifications (MM61).

## **Session 12 – Infrastructure, Planning Obligations and Delivery**

AM to include reference to the legal and policy tests in SS12

Additional modification added to the draft schedule (AM26).

## Session 13 – Monitoring

Amend para 10.4 to refer to the requirement to review the Local Plan every 5 years in line with the NPPF, refer to the Housing Delivery Test and add “needs of adjoining authorities should it be necessary”

Main modification to amend text included in the schedule of draft main modifications (MM56).

### Additional Action

List of commitments and completions since 2014 by Parish for Rural Areas

This information is provided within Appendix 9.

### Further information

At Hearing Session 8 (Leek and Leekbrook), the physical and financial deliverability aspects of proposed employment allocation site ADD09 (Policy DSR3) were considered. The discussion also related to the nature of the Docksey’s operations and site access questions. In light of the hearings and queries raised, the Council has sought and obtained information from the company which may be use to you in your deliberations. With your approval, we would like to submit this information to you separately for consideration.

I trust that this information will be of assistance to you.

Yours sincerely,

Mark James  
Senior Regeneration Officer – Planning Policy