

Staffordshire Moorlands Local Plan – Schedule of Additional Modifications November 2018

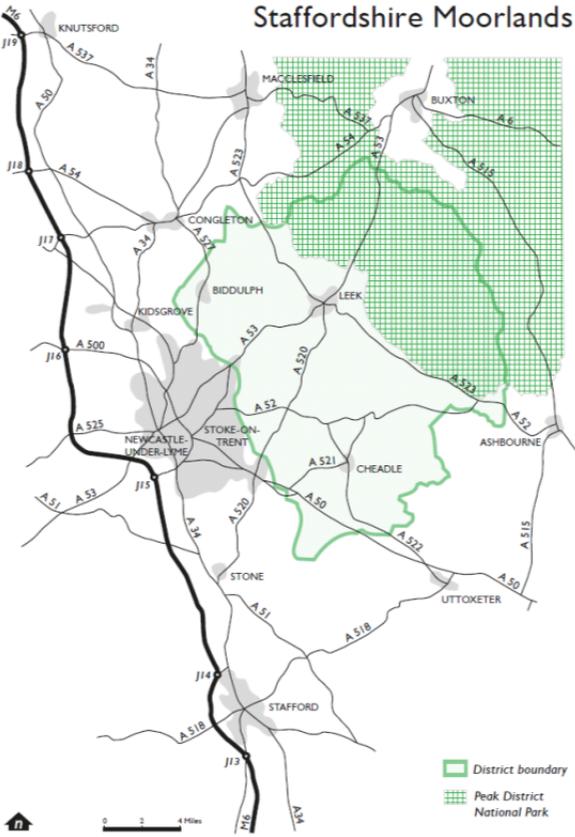
(including those listed 31st May 2018)

Mod No.	Page	Para/Policy Number	Proposed Modification (deleted text has strikethrough, new text is <u>underlined</u>)	Reason
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"> • A Portrait of Staffordshire Moorlands - a description of the District • The Challenges - a summary of the key challenges facing the District • The Vision – detailing what the Staffordshire Moorlands will be like in 2031 • Aims and Objectives – stating what the Local Plan is proposing to achieve • A Spatial Strategy and Strategic Policies – setting out the over-arching strategy and policies for the District • Development Management Policies – setting out specific measures to manage development • Strategic Development Site Policies - specific policy to guide the development of strategic sites <u>and others requiring bespoke policy</u> • Implementation and Monitoring - a framework for how the plan will be implemented and monitored • Maps - for Leek, Biddulph, Cheadle and the Rural Areas which identify proposed sites and boundaries 	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>Statutory Period for Representations on the Submission Version Local Plan</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 27th February and 11th April 2018.</u> All representations received at this stage will be <u>were forwarded on 'submitted'</u> to the Secretary of State alongside the Submission Version Local Plan. The 'submission' of these (and other relevant) documents is anticipated to take place in June 2018. <u>Those objectors from the statutory period for representations had</u> will have 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. Both methods carry equal weight. It is anticipated that <u>The examination hearings will begin in September</u> took place in October 2018.	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"> • Strategic Housing Market Assessment (SHMA) (2014) and Update (2017) • Employment Land Study (2014) and Update (2017) • <u>Sustainability Appraisal Report (Submission version Local Plan) (2018)</u> • Updated Gypsy and Traveller Needs Assessment (2015) • Retail Study (2013) • Retail Impact Assessment Thresholds Review (2017) • Level 1 Strategic Flood Risk Assessment Update (SFRA) (2015) • Ecological Studies (2015, 2016 and 2017) • Cheadle Town Centre Transport Study (2015) and Phase 2 Assessment (2017) • Green Belt Review (2015) and Updates (2016 and 2017) • Strategic Housing Land Availability Assessment (SHLAA) (2015) • Green Infrastructure Strategy (2017) • Open Space Update Report and Standards Paper (2017) • Playing Pitch Strategy (2017) • Development Capacity, Viability and Community Infrastructure Levy Study (2018) • Infrastructure Delivery Plan (2018) • Habitats Regulations Assessment of Submission Version Local Plan (2018) • Landscape, Local Green Space and Heritage Impact Assessment (2016 and 2017) 	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	Once adopted, <u>The new adopted Local Plan will form</u> part of the statutory Development Plan setting out the local planning authority's policies and proposals	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 six <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	Two <u>Other</u> areas have expressed an interest in producing a Neighbourhood Plan and are due to formalise their neighbourhood areas. They are Forsbrook and Leek.	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	<u>Supplementary Planning Documents</u> <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"> • <u>Developer Contributions SPD (to be updated)</u> • <u>Design Guide (adopted 2018)</u> 	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"> • <u>Churnet Valley Master Plan SPD (adopted 2014)</u> • <u>Leek Town Centre Master Plan SPD (adopted 2014)</u> • <u>Cheadle Town Centre Master Plan SPD (adopted 2014)</u> 	
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 is 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 st May 2018)

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			<p style="text-align: center;">Location of the Staffordshire Moorlands</p>  <p style="text-align: center;"> District boundary Peak District National Park </p>	
AM14	27-28	<p>Improving the housing market box under para 4.1</p>	<p>Amend 2nd 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> away from smaller terraced properties towards <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>	<p>To make this para consistent with evidence and other references in the Plan in response to the Inspector's preliminary questions.</p>

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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 st May 2018)
AM15	47	Policy SS2 Settlement Hierarchy	Amend 4 th para: Other Rural Areas – 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 the 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) <i>Footnote As of 31 March 2018</i> 2017	Grammatical corrections and to update the base date information to 31 March 2018.

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AM18	52	7.31	This Policy SS4 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 st 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 st 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 <u>However, some are set within the Green Belt by virtue of the alignment of the Green Belt boundary.</u> , except where they have been excluded from the Green Belt. 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 SS10 <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 th 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: Development shall be in accordance with the Churnet Valley Masterplan.	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 policy as follows: 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. <u>Planning obligations will only be sought where they meet all of the following tests:</u> a) necessary to make the development acceptable in planning terms;	Grammatical correction and outcome of examination hearing session 12 - Infrastructure, Planning Obligations and Delivery.

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			<p>b) <u>directly related to the development; and</u> c) <u>fairly and reasonably related in scale and kind to the development.</u></p> <p>Standard formulate will be applied when applicable. The Developer Contributions SPD will provide further guidance on how contributions will be calculated.</p> <p>Provision will be required for subsequent maintenance where contributions are secured for facilities which are predominantly for the benefit of users of the development concerned.</p> <p>Subject to an assessment of development viability and further consideration by the Council, infrastructure requirements related to the cumulative impact of development in Staffordshire Moorlands will generally be supported by the Community Infrastructure Levy. The Infrastructure Delivery Plan that supports the Local Plan provides further clarification on infrastructure needs and sources of funding.</p> <p>The Infrastructure Delivery Plan will be reviewed regularly to ensure that it remains up-to-date. In implementing this policy regard will be had to economic viability considerations, consistent with meeting the Local Plan objectives.</p>	
AM27	86	8.6	<p>Government Policy states that Councils should take into account the economic 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</p>	<p>Grammatical correction. (Dataset does relate to 'likelihood of' best and most versatile agricultural land). (In response to inspector's preliminary questions).</p>

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			Code of practice for the sustainable use of soils on construction sites.	
AM28	86	8.7	The submission of environmental information listed in Part(4) (5) 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 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 schemes for 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.	Grammatical correction.
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' micro -renewables, or District Heating installations.	For clarity in response to LPS242. (Schedule of Additional Modifications 31 st 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	For clarity in response to LPS190. (Schedule of Additional

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			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>	Modifications 31 st May 2018)
AM32	92	SD4 Pollution and Water Quality	Amend 2 nd 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) for <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 to <u>about</u> flooding generally. Development patterns can have distorting effects on the water cycle and drainage systems (for example, artificial features 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.	Grammatical correction.
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 (EA), Staffordshire	To explain abbreviated terms used later on in the Plan text in response to inspector's preliminary questions.

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			<p>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 Environment Agency EA 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.</p>	
AM35	94	Para 8.24	<p>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 Framework Directive (WFD)</u> assessment. Crossings of water courses should be made where possible by a bank top to bank top bridge system in preference to culverts. 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.</p>	To explain abbreviated terms used in the Plan text; and grammatical correction, in response to inspector's preliminary questions.
AM36	94	Para 8.25	<p>Amend policy as follows:</p> <p>This Policy SD5 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</p>	For clarity in response to inspector's preliminary questions.

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			<p>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"> 1. An adequate soakaway or some other form of Sustainable Drainage System (eg pond,swale,wetland etc). 2. An attenuated discharge to watercourse. 3. An attenuated discharge to public surface water sewer <u>or highway drain</u>. 4. An attenuated discharge to public combined sewer. 	<p>For clarity in response to LPS186. (Schedule of Additional Modifications 31st May 2018)</p>
AM37	95	Para 8.26	<p>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. 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.</p>	<p>To delete repetition from para 8.25.</p>
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</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 31st May 2018)</p>

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			<p>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 https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx . 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 Updated Flood Map for Surface Water <u>Water 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>	
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 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. Note that 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 this <u>Policy E1</u>.</p>	For clarity.
AM40	100	Para 8.35	<p>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. Note that 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</p>	For clarity.

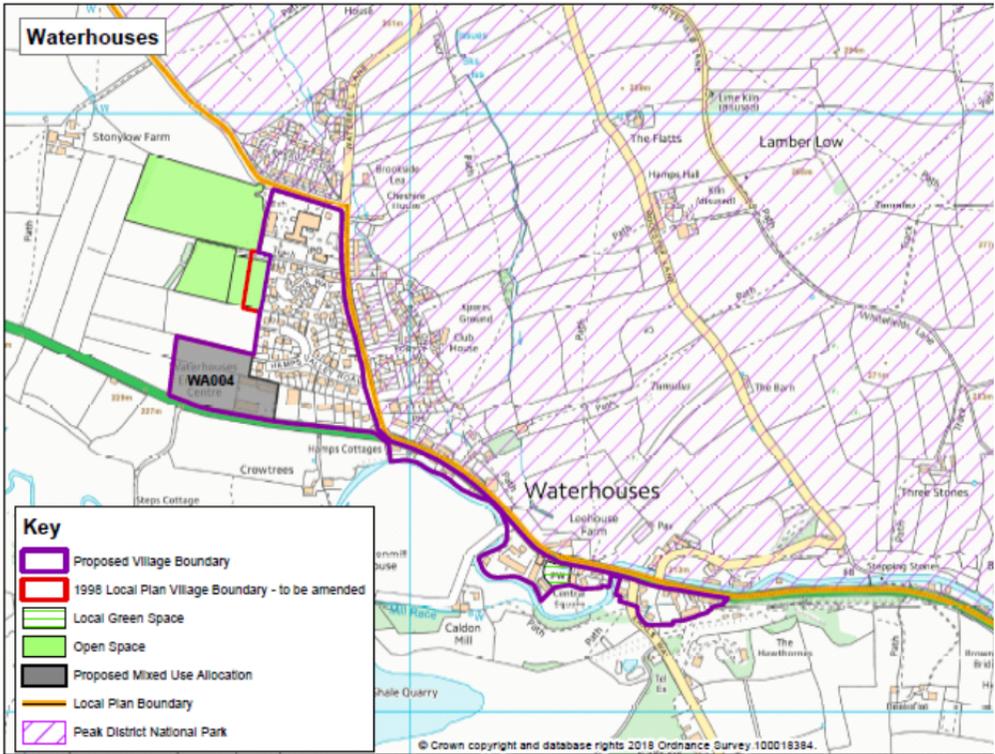
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			does not specify sub-uses so as to maximise the freedom of subsequent occupants. However Policy SS4 carries forward the ELRS update expectations about splits between B-uses. The Council will need to monitor the uptake of the respective sub-uses to assess how effectively employment land is being delivered across the District. Land requirements are expressed as a minimum.	
AM41	101	Para 8.36	Note that <u>As</u> 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. Note that, <u>As</u> 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 land <u>or employment use</u> (as defined in the Glossary) by proposing a sequential approach towards planning applications.	In response to the Inspector's preliminary comments that whilst employment land was 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	This Policy E4 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 Caldon 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	For clarity.

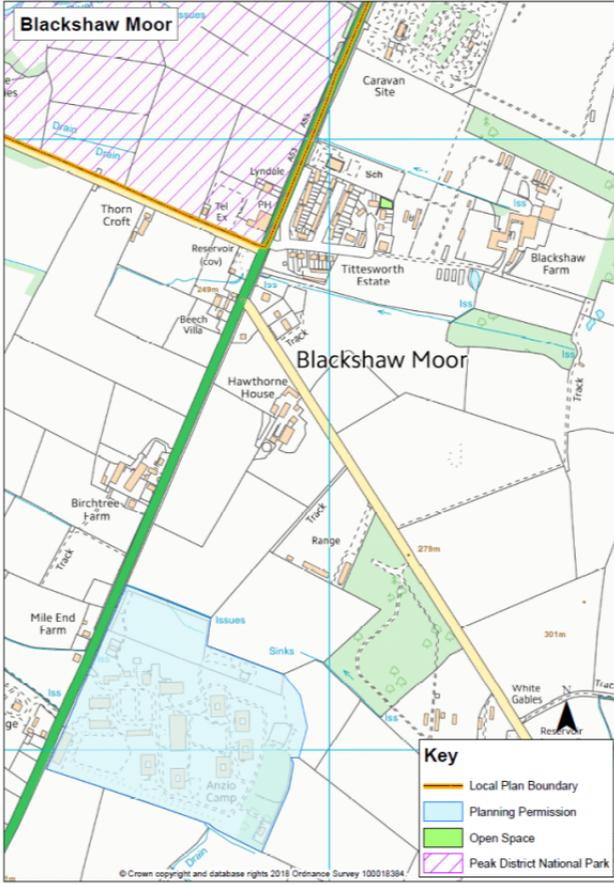
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			do not have a detrimental impact on the local area unless it can be demonstrated that a particular tourism proposal requires such a location. The policy also accords with the Strategic Policies and tourism policy for the Churnet Valley (Policy SS11) which seeks to promote the Churnet Valley as a sustainable tourism and recreational resource.	
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 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.	For clarity in response to inspector's preliminary questions.
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> Sites Proposals for touring caravans and camping sites will be granted providing they meet the criteria set out in <u>also need to satisfy the terms of the policy.</u> Stronger controls will however apply across the Green Belt, including those parts of the Churnet Valley which are within it, in order to	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

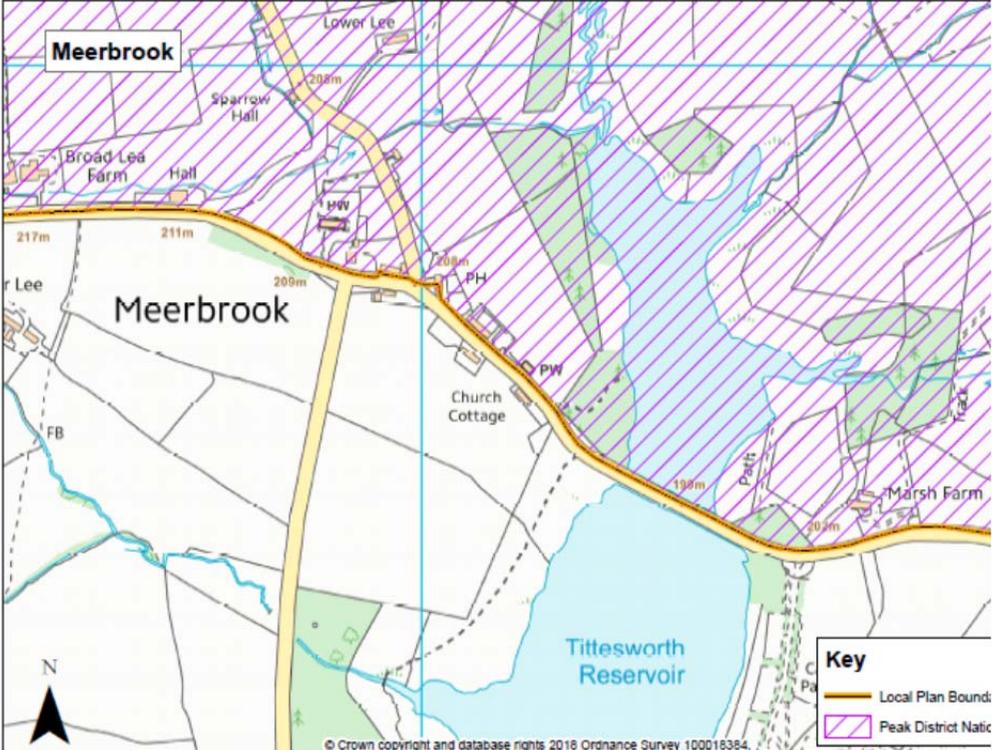
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			preserve their openness.	main modifications to Policy E4 (MM21).
AM46	111	8.54	In order to meet the housing requirement outlined in Policy SS3 and Policy SS4, the above sites <u>below</u> have been identified as suitable for development. In some cases this will be housing but in others the site may be more suitable for a mix of uses.	For clarity.
AM47	115	8.62	This policy is based on the 2015 'Planning Policy for Traveller Sites' Guidance 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.
AM48	137	8.106	Green Infrastructure is the network of green spaces and natural elements that intersperse <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.
AM49	140	8.114	The Staffordshire Moorlands Biodiversity Opportunity Map has been produced by Staffordshire Wildlife Trust in conjunction with other nature conservation bodies which to highlights areas of biodiversity importance. 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.	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.
AM50	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	To avoid duplicatory text contained in both paras (in response to the Inspector's preliminary questions).

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			<p>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 seeking improvements to the existing network.</p> <p>Delete para 8.134.</p>	
AM51	151	9.4	<p>A track in SCC ownership of <u>Churnet View Middle School</u> running to Wardle Barn Farm separates the Churnet View 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 SCC school 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.</p>	Factual correction
AM52	151	Para 9.8	<p>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.</p>	To explain abbreviated terms used in the Plan text in response to inspector's preliminary questions.
AM53	178	9.109	<p>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.</p>	For clarity.
AM54	186	10.1	<p>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:</p> <ul style="list-style-type: none"> • Capable of being delivered • Based on a partnership approach that helps to implement the aims and objectives of partner <u>organisations that benefit Staffordshire Moorlands</u> • organisations that benefit Staffordshire Moorlands • Flexible to reflect to changing circumstances, and have appropriate contingency measures <u>in place</u> 	To correct bullet spacing errors in response to the Inspector's preliminary questions.

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			<ul style="list-style-type: none"> in place Easy to monitor to determine how well the strategy is performing against indicators and targets 	
AM55	186	10.2	The following sections <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.
AM56	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, what their outcomes will be, how the policy will be implemented and which organisations will be responsible or involved in doing so.	Reflects deletion of Implementation table in response to the Inspector's preliminary questions.
AM57	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> and the historic character of the area	For accuracy (in response to LPS298, LPS300). (Schedule of Additional Modifications 31st May 2018)
AM58	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)
AM59	228-239	Appendix 4 Larger village maps [A4.1-A4.12]	Amend all Key boxes references from 'Proposed Village Boundary' to ' <u>Proposed Development Boundary</u> '.	To ensure consistency between the maps, Policy SS2, and other references throughout the Plan, in response to the Inspector's preliminary questions.
AM60	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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			 <p>The map shows the Waterhouses area with various planning boundaries and allocations. A purple outline indicates the proposed village boundary, which is wider than the 1998 local plan boundary shown in red. Green areas represent local green space and open space. A grey area is designated as proposed mixed use allocation. A yellow line marks the local plan boundary. The area is also overlaid with a pink hatched pattern representing the Peak District National Park. A key in the bottom left corner defines these symbols. The map includes labels for various locations such as Stonyknow Farm, The Flatts, Lamber Low, and Waterhouses. A copyright notice at the bottom of the map reads: © Crown copyright and database rights 2018 Ordnance Survey 100018384.</p>	
AM61	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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AM62	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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AM63	300	Glossary	<ul style="list-style-type: none"> Remove definition of 'Primary Shopping Area' from the glossary as this term is not used in the Local Plan. Primary and secondary Shopping Frontages – Primary shopping frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses. 	Removal of unnecessary wording in response to the Inspector's preliminary questions.
AM64	296	Glossary	<p>Amend "Employment Land":</p> <p>Employment Land/Employment uses – 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.