

Summary of Comments Received and Officer Response

List of suggested amendments to the HIS arising from the consultation

- Add further text to Amend Site Specific Constraints box on page 17 of the HIS to include 'land instability / Mining legacy'.
- Add further text to last row in table on page 20 of the HIS to include 'The Council are happy to help other developers facing similar viability issues which would mean schemes would otherwise not progress'.
- Amend HIS wording Appendix 1 to clarify housing numbers on the site with planning permission and within remaining allocation.
- Amend Appendix 1 reference to The Mount by adding in LE128 to commence in 2 years

No	Name/ Org	Document Ref	Summary of comments	Officer response
1	R Moseley	General comment	Need to ensure that the formula used to allocated housing quota's to all the areas, including Biddulph is scientific and thorough and based on the needs of the communities.	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. The distribution of development set out in Submission Version Local Plan was discussed at the examination hearing sessions and written representations considered. <p>Recommendation: No change proposed.</p>

2	R Simcock	HIS	<ul style="list-style-type: none"> • Concerned that: <ul style="list-style-type: none"> ○ Over-reliance on unimplemented planning approvals with no developer interest at present. These are problem sites which should be treated with caution. ○ Sites where council minded to approve but currently awaiting S106 agreement should not be relied on. S106 agreements can sometimes take years and discussions break down. • Exceptional circumstances for Green Belt release around Biddulph been established by Core Strategy Inspector and by Local Plan Inspector in advice issued in Dec 2018. • Inspector has concluded that BDNEW is not sound. Subsequent deficit arising from this must be addressed in the plan period and be met by allocated sites. Leaving the location of delivery over the plan period unspecified will lead to risk and unsustainable housing growth. In order to deliver housing in Biddulph, one of the most sustainable settlements, in line with the spatial strategy and provide much needed affordable housing, the Council needs to release BD068 and BD087. There are no viability constraints on these sites which would rule out a policy-compliant quantum of affordable housing. • SMDC has not ruled out further Green Belt release in Biddulph in its Jan 19 reply to the Inspector. Those sites included BD068 and BD087 which had been highlighted as suitable for release under exceptional circumstances. Agree that here are no technical hurdles or constraints to delivery and the Inspector recognises that 'delivery from other Green Belt releases equivalent to BDNEW could commence in the same (5 year) period'. Relevant Statutory Consultees have already been consulted and confirmed that there are no impediments to the immediate delivery of these sites. United Utilities have no objections to our initial submissions for the sites. • Consider it is common sense to release these sites and enable the delivery of badly needed housing and community facilities on land that has no meaningful contribution towards the purposes of the Green Belt. Sites should be proposed as a MM to partly make up the deficit caused by BDNEW. 	<ul style="list-style-type: none"> • 10% slippage allowance has been applied to commitments and this has been reflected in the 5 year housing land supply in the HIS. Data indicates that between 1.2% and 11.6% of permissions have lapsed between 2014/15 and 2016/17 therefore the 10% slippage allowance is higher than the average rate. • Part 13 of the HIS includes details regarding the Council's Accelerated Housing Programme and proactive measures and Council led interventions. • BDNEW has not been included in the housing trajectory in the HIS in order to reflect the Inspector's post hearing advice. • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. • Sites in Biddulph are subject to separate consideration. <p>Recommendation: No change proposed.</p>
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3	J Pigott	HIS	<p>The number of dwellings on The Mount have not been reduced in the HIS. It is considered that this does not reflect the Inspector's Post Hearing Advice that the Plan should be modified to give recognition to the recreational value of The Mount to the community and which should be reflected in master planning proposals, green infrastructure, key views and connectivity to public rights of way. The only way to achieve this is to provide more green infrastructure and recognise the importance of key views is by reducing the number of houses from 345 by 10 or 20%.</p>	<ul style="list-style-type: none"> Inspector's post hearing advice recommends an amendment to Main Modification (MM) 37 relating to the recreational value of the Mount. This does not include an amendment to reduce the number of dwellings within The Mount allocation. <p>Recommendation: No change proposed.</p>
4	D Brough	HIS	<ul style="list-style-type: none"> Consent for Blythe Vale dismisses opportunity to recommend the current 5 year land supply as noted and suggested by the Inspector. The Council is aware of a shortfall of dwellings in the Local Plan. Consider it more advantageous to look at smaller sites previously considered. Look at sites in the green belt, adjacent to fantastic transport links, providing sustainable, environmental, social benefits to all generations. Accelerated housing delivery programme needs to accommodate the Inspector's comments as well as local building projects encouraging smaller business opportunities providing a good cross section of housing to meet all needs. 	<ul style="list-style-type: none"> The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. Inspector's post hearing advice does not refer to the allocation of the Blythe Vale site being unsound and that alternative sites should be considered. The Submission Version Local Plan provides for a range of housing site sizes. <p>Recommendation: No change proposed.</p>
5	R Goodall	HIS	<p>With regard to the Blythe Vale Site:</p> <ul style="list-style-type: none"> The Local Plan allocation of 300 dwellings, over the plan period is monopolised by this one site. Even the Inspector questioned that this site would benefit the City of Stoke-on-Trent more than Staffordshire Moorlands. The quota of 300 dwellings will 	<ul style="list-style-type: none"> The consultation is focused on the HIS and other supporting evidence. The Blythe Vale site was discussed at the examination hearing sessions

			<p>be saturated in one area.</p> <ul style="list-style-type: none"> • St Modwen Homes have now applied to extend their current planning application of 118 dwellings to 146. Evidence from Turley representing St Modwen Homes states that all 300 homes allocated could be delivered within 5 years. The quota for 300 dwellings therefore could increase. • As Blythe Vale is not in the Green Belt it gives the Council an easy convenient option of meeting government targets without really assessing the impact of 300 dwellings, situated off busy roads and demonstrating how will it meet sustainability objectives bringing financial benefits of social infrastructure. • Questions will be raised as to the congestion, disruption and impact in one area. Incredible that the council believes that residents will walk to the railway station or catch a bus when services are being reduced in order to reduce carbon emissions. Does not believe that people will walk the 0.7 miles from the site to the railway station. Also questions that older people, families with young children and disabled residents will walk or cycle from the site? There are also potential hazards for pedestrians using the pavement. • Oversight not to consider smaller, preferential, micro sites in the green belt more suited to development because of sustainable location and proximity to amenities, transport links and financial benefits of social infrastructure. 	<p>and written representations considered.</p> <ul style="list-style-type: none"> • Part of the Blythe Vale allocation has planning permission. • Inspector’s post hearing advice does not refer to the allocation of the Blythe Vale site being unsound and that alternative sites should be considered. • The Submission Version Local Plan provides for a range of housing site sizes. <p>Recommendation: No change proposed.</p>
6	D Pyner Highways England	HIS	<ul style="list-style-type: none"> • Highways England (HE) is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The SRN that runs through the district consists of the A50 trunk road between Blythe Bridge and Uttoxeter. HE is supportive of the SMLP’s stance on promoting active travel in order to reduce the need for travel by private car and also the revisions to the HIS. • The HIS gives details of the revisions to the 2014 SHMA however little detailed analysis has been made of potential trip generation of the revised OAN and its potential traffic impact on the SRN. • Note there may be material implications for our network at the A50/A521 Blythe Bridge roundabout junction arising from development in the 	<ul style="list-style-type: none"> • Policy DSR1 Blythe Vale refers to the need for a Transport Assessment which includes an analysis of the traffic impact on the surrounding road network, including the A50 and early engagement with Highways England. • Part of the Blythe Vale allocation has planning permission. • The Duty to Cooperate

			<p>district. In this light we have identified that more detailed traffic assessment of the A50/A521 junction is a priority. Furthermore, the implications of development traffic at this junction are likely to be cumulative with emerging issues arising from the plans and strategies of East Staffordshire Local Plan and the emerging revised North Staffordshire Joint Local Plan.</p> <ul style="list-style-type: none"> • At a site specific level, a number of developments are in close proximity to the A50; particularly the major Blythe Vale development. As the access to this site and developments in the area are likely to have a direct impact on the SRN, Highways England will seek continued communication with site developers and SMDC to ascertain traffic impacts and potential mitigation proposals. • Recommended that the individual site promoters should undertake detailed transport analysis and assessment of their sites, either at this plan making stage or as part of future planning applications. Highways England would wish to be involved the scoping of these assessments. • HE will seek to work in partnership with SMDC and Staffordshire County Council as the local highway authority to consider the traffic implications of the identified sites and work with you to confirm any mitigation measures that will be required to deliver the local plan. This is necessary in order to ensure the SRN continues to operate its primary role as a strategic route. 	<p>Statement with neighbouring authorities agrees that all partners and signatories will work together to implement the requirements of Policy DSR1 to ensure that cross boundary strategic planning matters are addressed.</p> <ul style="list-style-type: none"> • Welcome the continued commitment to partnership working with Highways England, Staffordshire County Council and neighbouring authorities. <p>Recommendation: No change proposed.</p>
7	R House Gladman	HIS	<ul style="list-style-type: none"> • In its reps on the Submission Local Plan and in its Hearing Statement Gladman has contended that the housing requirement within the Local Plan is unlikely to be delivered because of a number of reasons including: <ul style="list-style-type: none"> ○ An overly optimistic reliance upon windfalls ○ An unrealistic housing trajectory, particularly in respect of large urban extensions allocated in the Local Plan. • Gladman considers the Local Plan will not provide for a 5 yr supply of housing on adoption (assuming this is towards the end of 2019) or likely to be in place throughout the plan period. • The HIS provides scant evidence that the housing requirement will be 	<ul style="list-style-type: none"> • The Council has adjusted the housing trajectory based on the evidence submitted at the examination hearing sessions and to reflect the Inspector's post hearing advice to add in a slippage allowance of 10%. Data indicates that between 1.2% and 11.6% of permissions have lapsed between 2014/15

		<p>delivered. It demonstrates that windfall rates historically have been high but this has occurred during a period where there has not been an up-to-date plan in place. The new Local Plan does not provide a policy framework that will allow for a similar level of windfall development to come forward.</p> <ul style="list-style-type: none"> • Although a number of alterations have been made to its Housing Trajectory it remains overly optimistic in relation to lead in times and delivery rates. The lead in period for larger sites is impacted by a number of factors including gaining outline consent, negotiating S106 agreements, preparing development briefs, reserved matters applications, discharge of conditions, need for infrastructure investments, site clearance and difficulties caused by sites in multiple ownerships. • This is evidenced by Section 11 of the HIS and the table of sites with unimplemented planning approvals. It contains 25 sites (both large and small totalling 1090 dwellings) with planning approval (outline or full) or awaiting S106. One dates from 2013, five from 2014, three from 2015, seven from 2016, eight from 2017 and one from 2018. Developments concerning 267 dwellings remain un-started 5 or more years from the grant of planning permission. • The HIS describes the actions the Council is taking to bring housing sites forward for development. These are set out in the Council’s Accelerated Housing Delivery Programme introduced in April 2018. Whilst Gladman welcomes the recognition by the Council that its delivery has been poor, the actions it proposes are those one would expect all Council’s to put in place. As it has only been in place since April 2018 it is too early to say that the Council’s proactive approach is starting to improve delivery rates and the Council has not provided any evidence that this is the case. • Notes historic windfall, however this has occurred during a period when there has not been an up-to-date Local Plan. The determination of planning applications for residential development 2006 - 2018 therefore took place in the absence of an up-to-date plan and since 2012 a lack of a 5 yr supply of housing land. In these circumstances, the granting of windfall development not surprisingly increased. Once the emerging Local Plan is adopted, in theory a 5 yr housing supply ought to be in place as will policies restricting 	<p>and 2016/17 therefore the 10% slippage allowance is higher than the average rate.</p> <ul style="list-style-type: none"> • The Local Plan will provide a 5 year supply of housing on adoption which be reviewed on an annual basis. There is a requirement to consider a Local Plan review within 5 years. • The Council has adjusted the housing trajectory based on evidence submitted at the examination hearing sessions. Lead in times and delivery rates are also supported by responses to the HIS consultation from/on behalf of Persimmon Homes, St Modwen Homes and CBRE Limited. • In addition to the introduction of the Accelerated Housing delivery Programme the HIS outlines the considerable progress that the Council has already made, working with partners to bring development forward. The HIS also includes evidence of past ventures such as the Ascent housing
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			<p>development on unallocated sites and consequently the scope for planning applications for windfall housing developments to be approved will be reduced.</p> <ul style="list-style-type: none"> • Considers that Council’s revised Housing Trajectory is unrealistic and will not have a 5 yr supply on adoption even allowing for the utilisation of the ‘Liverpool’ approach spreading the undersupply over the whole of the plan period. • The Council’s trajectory assumes that 185 dwellings will be completed in 2019/2020 and 354 dwellings in 2020/2021 on sites which do not currently have planning permission. This figure comprises 75 dwellings on large sites with OPP, 95 on small sites (although some of these appear to have FPP) and 15 at Cheadle North allocation. The equivalent figures for 2020/2021 is 183 dwellings on large sites with OPP, 96 on small sites and 75 dwellings on proposed allocations. • In the light of empirical evidence set out in its representations and hearing statement, Gladman considers that these sites are unlikely to deliver any dwellings until 2021/22. Therefore the expected output from these sites should be pushed back by 2 years in the trajectory. This means that the projected completions for 2019/20 should be reduced to 201 and for 2020/21 to 186. The Council’s projected output from these sites for 2019/20 and 2020/21 should replace the projected outputs for 2021/22 and 2022/23 respectively. On that basis it is unlikely that the Council would be able to demonstrate a 5 yr supply of housing land on adoption of the plan. 	<p>programme.</p> <ul style="list-style-type: none"> • The windfall allowances set out in Local Plan Policy SS3 reflect past trends and background information on Windfall Allowance and Justification is provided in Examination Document EL7.002. The policy approach to windfall is more positive than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward. • The trajectory does rely on sites with outline planning permission and Local Plan allocations in line with the NPPF and PPG. Information on progress on these sites including planning applications is detailed in Appendix 1. <p>Recommendation: No change proposed.</p>
8	M Lindsley Coal Authority	General Comment	Confirm that the Coal Authority has no additional comments to make.	<p>Comment noted.</p> <p>Recommendation: No change proposed.</p>
9	D Nixon C Nixon & Partners LLP	General comments	<p>Believe that our site can assist in addressing some of the deficiencies and shortfalls identified in the Inspector’s Post Hearing Advice.</p> <ul style="list-style-type: none"> • As the Inspector recommends the deletion of allocation DSR3 suggest that 	<ul style="list-style-type: none"> • The consultation is focused on the HIS and other supporting evidence. The Blythe Vale site

		<p>our proposed site at Moor Green Farm, Forsbrook could assist in meeting this shortfall through the provision of around 0.5ha of employment land as part of a mixed use development. There is a suggestion that the shortfall could be made up by windfalls however it is considered that this is not a reliable mechanism at times of economic downturn.</p> <ul style="list-style-type: none"> • Concerned that the Council’s assessment of future housing delivery was based upon more positive economic circumstances. Uncertainty relating to Brexit and future economic growth and the significant downturn in the number of planning applications and housing completions has not been factored in by the Council. Likely that there will be a delay in the commencement of housing development on allocated / committed sites and a slow down in the number of houses delivered. • Inspector has concerns related to the reliance upon windfalls & particularly the deliverability of affordable housing. We are concerned about viability issues, particularly in tighter economic times. • The Blythe Vale allocation requires costly new infrastructure which is likely to delay implementation and delivery and its development will have a significant environmental impact affecting the topography of the land. • Invite the Inspector to include this site as an allocation: <ul style="list-style-type: none"> ○ It is unlikely to be affected by economic factors because of our ownership and philanthropic vision to deliver development which meets the needs of Forsbrook. ○ Would complement the landscape and include areas of woodlands and open space. It is also well related to the village and has much better and shorter pedestrian links. ○ Scores well in relation to the 5 purposes of the Green Belt as set out in the NPPF and the Council’s Green Belt Review Study. ○ Development would meet the wider strategy and Policy SS8. ○ Would provide employment, affordable housing, housing for older people (identified in the HIS) and starter homes. ○ Could provide up to 10 self-build plots. ○ Could provide a more attractive and softer edge to the Green Belt (1981 Green Belt Local Plan Inquiry) 	<p>was discussed at the examination hearing sessions and written representations considered.</p> <ul style="list-style-type: none"> • Inspector’s post hearing advice does not refer to the allocation of the Blythe Vale site being unsound and that alternative sites should be considered. • Background information on Windfall Allowance and Justification is provided in Examination Library ref no EL7.002. • The Council’s Local Plan and Site Allocations Viability Study consider the viability of sites of various sizes across the district (Examination Library Ref 24.1). <p>Recommendation: No change proposed.</p>
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10	G Powell Cheadle Unite	General comments	<p>Cheadle Unite (CU) made representations to the Inspector which included a case for significantly reducing the housing provision for Cheadle:</p> <ul style="list-style-type: none"> • SMDC have used a flawed ‘Oxford economics’ model from Lichfield Consultants, which heavily influences the overall provision and fails to account for wider constraints such as road infrastructure and local opinion. The Lichfield Report should be removed from the evidence base as the Previous Secretary of State for Housing stated in Sept 2017 (quote provided). • There are other options SMDC had at their disposal to make a more balanced and informed judgement such as: <ul style="list-style-type: none"> ○ Local opinion ○ Health issues including air pollution levels ○ Infrastructure constraints ○ Loss of agricultural land, wildlife and green spaces ○ Economic realities ○ Long term sustainability ○ Effective duty to co-operate with adjoining LPAs ○ More rational interpretation of the raw ONS population predictions and DCLG housing projections • Level of housing proposed by SMDC is excessive with a potential swell of population by 20% in 15 years. • SMDC not worked effectively on duty to co-operate issues. Inward migration will not help the regeneration of Stoke-on-Trent/ Potteries where there are sustainable sites available for affordable housing. • Highways evidence states that the ‘network generally operates within capacity’, although there is queueing of traffic along roads in Cheadle during PM peak hour. This congestion will clearly be affected by additional housing and Nitrous Dioxide emissions will increase. The transport plan for Staffordshire 2000 indicated a SW distributor road which has never been delivered. Options for a northern link adjacent to JCB involve costs that are prohibitive. Housing plans have not been reduced to form a long term strategy to constrain and reduce Nitrous Dioxide Emissions. • LPA’S are required to review and assess air quality in their area and reduce the level of emissions. Data shows average levels are already close to target 	<ul style="list-style-type: none"> • The consultation is focused on the HIS and other supporting evidence. The distribution of development set out in Submission Version Local Plan; the level of housing provision proposed in Cheadle; traffic congestion and issues around duty to co-operate with neighbouring authorities were discussed at the examination hearing sessions and written representations considered. • There are no Air Quality Management Areas (AQMAs) identified in the Staffordshire Moorlands. • Affordable housing targets are included in Local Plan Policy H3 and Local Plan Policy H1 requires that housing developments should aim to provide flexible accommodation which is capable of future adaptation. • The Accelerated Housing Delivery Programme (AHDP) is a Council initiative to help to bring forward housing sites. Public consultation on sites is undertaken through the Local Plan process and through the consideration of planning
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		<p>limits.</p> <ul style="list-style-type: none"> • Not acceptable to plan increased congestion that will impact and raise NO2 levels against a long term and ethical objective to lower NO2 emissions. Particularly when there are clear alternative solutions in regeneration of brownfield sites in the City where public transport options can drastically reduce new NO2 emissions. • HIS not set an affordable housing target. Build affordable housing in Stoke where infrastructure exists. • Need for smaller 1 to 2 bedroom dwellings for older residents. Potential to release 3 and 4 bedroom properties for our younger population. • Question level of community engagement in the 'Accelerated Housing Delivery Programme'(AHDP). 	<p>applications.</p> <p>Recommendation: No change proposed.</p>
11	Ken Wainman	<ul style="list-style-type: none"> • Proposed distribution of housing between towns / larger villages / smaller villages is a major concern. The 28% allocation for rural areas needs to be increased to more reflect the likely level of need. • How will housing for older people be achieved. More guidance and standards needed. • Several of the larger villages do not contain any allocated housing sites and most are surrounded by Green Belt. Village boundaries are drawn tightly leaving little space for infill / windfalls. The boundaries around the larger villages are fundamentally the same as in the 1998 Local Plan. • Policies SS8 and SS9 do not accord with the advice in the NPPF as regards local needs. Reliance on windfall supply will mean housing/affordable housing will not be met. Where there are no sites of 10 or more how will affordable housing be met? • Specific sites in villages need to be identified to meet housing /affordable housing/ social housing need (including possible rural exception sites) to meet the housing demand. • Over reliance on windfalls and historic rates because many schemes have been allowed because there has not been a 5-year supply and the presumption in favour has been applied. • Blythe Vale housing site means that there is not even provision in the rural area. 	<ul style="list-style-type: none"> • The consultation is focused on the HIS and other supporting evidence. The wider spatial strategy, larger /smaller villages (including infill boundaries) and affordable housing were discussed at the examination hearing sessions and written representations considered. • The windfall allowances set out in Local Plan Policy SS3 reflect past trends and background information on Windfall Allowance and Justification is provided in Examination Document EL7.002. The policy approach to windfall is more positive

		<ul style="list-style-type: none"> • Policy H3 (3) proposes that rural exception sites will be permitted in, or on the edges of, villages. However, such sites are difficult to finance (only 1x since 2006). Rural exception sites would possibly be the only way of providing affordable housing. Focus should be in the larger villages rather than the rural ones. • Removal of settlement boundaries should be reconsidered as part of the first review and development boundaries provided in the Green Belt. These boundaries should not be tightly drawn but should be drawn to include potential infill sites. Would ask that a more positive approach be given when deciding planning applications for housing e.g. Longsdon. • Active programme of Detailed Housing Need Assessments should be conducted by the Council rather than relying on applicants. A delivery mechanism should instigate, develop and implement a strategy for the Provision of Rural Exception sites. • The Council's commitment to proactive interventions is welcomed particularly the CPO powers and joint venture schemes. 	<p>than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward.</p> <ul style="list-style-type: none"> • Inspector's post hearing advice does not refer to the allocation of the Blythe Vale site being unsound and that alternative sites should be considered. • The Submission Version Local Plan provides for a range of housing site sizes. • Local Plan Policy H3 allows affordable housing on suitable rural exceptions sites. • The preparation of detailed Parish Needs surveys is not considered a significant cost in the preparation of an application; however the Council expects the applicant to prepare these in partnership with a registered social housing provider to an established methodology. The Council has decided at a corporate level that it no longer prepares these for individual parishes given the Council resources involved. • The Strategic Housing Market Assessment (SHMA) provides
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				<p>more detail about housing needed by older people (Examination Documents 27.1-27.6). Local Plan Policy H1 also requires that housing developments should aim to provide flexible accommodation which is capable of future adaptation.</p> <p>Recommendation: No change proposed.</p>
12	L Horleston	HIS	<ul style="list-style-type: none"> • Only 2847 dwellings are allocated (46.82% of the total). Inspector has worsened the position by questioning BDNEW area to 2257 or 37.15% of the total. • This means that 63% of new homes will be subject to a ‘free for all’ planning approach. The vast majority of which will end up in the rural areas especially since development boundaries are to be removed from smaller villages. • An example of this is the Cresswell development where planning permission was granted for 168 dwellings in a small rural hamlet. This will affect the Blythe Vale allocation and the village of Blythe Bridge and Forsbrook. • There has been a large increase in new homes being granted planning permission in remote rural areas such as Cresswell. • Non-allocated housing element of the Local Plan should be rejected and reconsideration given to preparing a new version of the Local Plan, with just a small windfall allowance. • SMDC have used a flawed ‘Oxford economics’ model from Lichfield Consultants, which heavily influences the overall provision and have failed to account for wider constraints such as road infrastructure and local opinion. This Lichfield Report should be removed from the evidence base as the Previous Secretary of State for Housing stated in Sept 2017 (quote provided). • The level of housing provision proposed by SMDC is excessive, rural areas will bear the brunt, thousands will suffer as the infrastructure buckles, air 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. The spatial strategy policies including the smaller villages and housing need were discussed at the examination hearing sessions and written representations considered. • In addition to the 2,847 dwellings (46.82%) allocated in the Submission Version Local Plan 2,121 dwellings (34.88%) have been built or have planning permission granted. There is also a Peak Park allowance of 100 dwellings. Together these account for 83.35% of the gross housing requirement. • Background information on

			<p>pollution rises and quality of life is reduced.</p> <ul style="list-style-type: none"> • Question level of community engagement in the 'Accelerated Housing Delivery Programme'(ADHP). 	<p>Windfall Allowance and Justification is provided in Examination Library ref no EL7.002.</p> <ul style="list-style-type: none"> • The ADHP is a Council initiative to help to bring forward housing sites. Public consultation on sites is undertaken through the Local Plan process and through the consideration of planning applications. <p>Recommendation: No change proposed.</p>
13	Advance Land and Planning Ltd (Seabridge Developments)	General comments	<p>With regards to the Council's Response to the Post-Hearings Advice:</p> <ul style="list-style-type: none"> • The Council has written to the Inspector to contend his soundly based recommendation that BDNEW should be deleted and replaced by suitable alternative sites to an equivalent capacity. Regrettable that the Council now appears to be seeking to extend the debate on Biddulph after the hearing session has ended. Feel the need to respond in order to ensure that the Inspector has the correct information and our perspective on the Council's latest comments. • Concerned at the Council's inference that United Utilities (UU) objected to the previously proposed 'preferred options' sites near to its works. UU has never objected to the potential allocation and residential development of the Preferred Options (2016) sites at Gillow Heath, including BD062 and BD068. Instead it strongly recommended that any such allocations be informed by an odour impact assessment and a noise assessment. • Subsequently, our client, Seabridge Developments Limited (BD062) and also the owner/promoter to the north-east of the treatment works (BD068) undertook separate odour and noise assessments in consultation with UU, which then confirmed in writing that it was satisfied with the empirical 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. • Sites in Biddulph are subject to separate consideration. <p>Recommendation: No change proposed.</p>

			<p>evidence and that it had no objection to the proposed allocation of our client’s land for housing. The Council was provided with the odour and noise assessments, along with UU’s written confirmation and Officers duly confirmed that there were no sustainable objections in respect of these two issues.</p> <ul style="list-style-type: none"> • This Council has an abject record of housing delivery, resulting in the suggested use of the Liverpool approach to dealing with the shortfall, throughout the Plan period up to 2033 (not 2031). Furthermore, the Plan proposes to allocate only a few large sites in Biddulph. The Wharf Road site has significant constraints and delivery issues which are well documented. • We continue to maintain that there is a need for additional smaller sites that are unconstrained and capable of early delivery. Moreover, the Core Strategy Inspector gave a strong indication of the opportunity to review the Green Belt at Gillow Heath and as the local Plan Inspector has suggested, there is also a potential requirement to safeguarded land. • Strongly dispute the Council’s assertion that it need not allocate replacement sites for BDNEW. This would make a mockery of the Plan-making process, potentially leaving it open to challenge. 	
14	C Burton	General comments	<p>Did the Inspector see the problem of school traffic in Brookfield Avenue, Endon? If so, what are his recommendations/thoughts? Are there any amendments to be made to the proposed development?</p>	<ul style="list-style-type: none"> • The consultation is focused on the HIS and other supporting evidence. The Endon allocation (EN128) was discussed at the examination hearing sessions and written representations considered. <p>Recommendation: No change proposed.</p>
15	R Finney	HIS	<ul style="list-style-type: none"> • I note that the majority of the building will be run by 2 un-named developers who have already obtained funding of £1.7m and £2.7m respectively. Only 2 key developers raises the question of putting your eggs in one basket. • Question why split between social / market housing is in favour of the developer? Your Housing – a not for profit provider of social housing should 	<ul style="list-style-type: none"> • The council has worked with two developers of specific sites for funding bids to support viability gaps which would mean schemes would

			<p>be the key leaders in providing social housing and should not have to purchase properties from developers who will be making a profit.</p> <ul style="list-style-type: none"> • Housing requirement may change in the light of Brexit and reduced immigration. • Facilities and services in the smaller villages are limited. • Development issues referred to in Section 12 are relevant and should not be ignored. References air quality, land instability and surface water issues. 	<p>otherwise not progress. The Council is happy to help any other developers facing similar viability issues.</p> <ul style="list-style-type: none"> • The consultation is focused on the HIS and other supporting evidence. The spatial strategy policies including the smaller villages and housing need, including affordable housing was discussed at the examination hearing sessions and written representations considered. • Comments in relation to challenges and barriers in section 12 of the HIS are noted. Consider that land instability / mining legacy could be added to the list of 'Site Specific Constraints' on page 17. <p>Recommendation:</p> <ul style="list-style-type: none"> • Add further text to Amend Site Specific Constraints box on page 17 of the HIS to include 'land instability / Mining legacy'. • Add further text to last row in table on page 20 of the HIS to include 'The Council are happy to help other developers
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				facing similar viability issues which would mean schemes would otherwise not progress’.
16	Van Adricham J & A	General comment	<ul style="list-style-type: none"> Comments previously sent requesting the reasoning behind the change of the boundary lines. No consultation on village boundary lines as stated in the Statement of Community Involvement has been undertaken. No response has been received. 	<ul style="list-style-type: none"> The Council’s response to previous comments made can be found in the Examination Library Consultation Statement Ref 5.3. Details regarding previous consultation stages can be found in the Examination Library Consultation Statement Refs 5.1 – 5.3. <p>Recommendation: No change proposed.</p>
17	P Housiaux		<ul style="list-style-type: none"> Refers to non-compliance with the SCI and past/outstanding FOI requests. Asks for clarification regarding the publication of examination documents on the Council’s website? Will consultation be undertaken on the new evidence, Main Modifications and Inspector’s issues identified in Dec 18 letter to the Council? What is the Status of the Accelerated Housing delivery Programme (AHDP)? Common sense would suggest this is the HIS. The law requires that SMDC must prepare a Local Plan based on appropriate evidence and be submitted with a full and complete evidence base including an Infrastructure Delivery Plan. Key evidence requested by the inspector has been submitted at a later date such as housing land supply data. No evidence has been submitted regarding Air Quality and its duty of compliance with the Habitat Directive. Question if the Peak District National Park Authority have been consulted? Draft Local Plan proposes an unsustainable approach which conflicts with the 	<ul style="list-style-type: none"> The consultation is focused on the HIS and other supporting evidence. Legal compliance, procedural requirements, the Duty to Cooperate, Spatial Strategy (including smaller villages), Green Belt issues and Housing OAN were discussed at the examination hearing sessions and written representations considered. All documents relating to the Examination including other supporting documents requested by the Inspector are

		<p>adopted Core Strategy policies. In particular the removal of smaller village boundaries undermine the protection given to them and Green Belt release.</p> <ul style="list-style-type: none"> • High number of housing completions have taken place in Whiston village and there is outline approval for 250 lodges. Many new homes in Whiston stand empty and view that any further building expansion of Whiston seriously undermines the nature, quality, historical and architectural heritage that residents fought so hard to retain. To attempt to apply any % figures to a slippage allowance would be nugatory. The Inspector is asked to URGENTLY reconsider his advice in paragraph 19 [for] Whiston. • If Inspector agrees with the removal of Settlement boundaries and impose monitoring he should hear further detailed argument at a public hearing and direct the submission of additional evidence and require consultation before final determination. For the inspector to suggest a regime of ' monitoring' is frankly itself 'unsound'. • The Green Belt issue also applies to the Churnet Valley. There has been a lack of a demonstration of exceptional circumstances as at February 2018, of the whole consideration of release of Green Belt land. The Inspector asked how the Council will resolve this issue. The only way it can be resolved legally is to withdraw the LP, then to produce an adequate evidence base that addresses the concerns about Green Belt land. • Figure of 6080 in Policy SS3 should be revised downwards to reflect the more accurate factual information now available. • There is no verifiable evidence base that the 2014 housing supply figures are accurate. It is respectfully suggested that evidence should be produced, heard and subject to challenge if necessary, before they are incorporated. It is noted that EL5.005 was produced after October 2018 hearing sessions. • Any assumption about a housing trajectory of a five year supply is in my respectful view unlawful. • Reports to Council Assembly Jan 2018 & July 2018 determined that the LP was ' sound' [but] concluded that the LP would not meet the ' housing requirement' which seems at odds. • Support proviso that any permission granted for market price housing could not be used until developers had completed the building of the affordable 	<p>available to view on the Council's website www.staffsmoorlands.gov.uk/examination_library.</p> <ul style="list-style-type: none"> • The Council will consult on Main and Minor modifications in due course. • The ADHP is a Council initiative to help to bring forward housing sites. Public consultation on sites is undertaken through the Local Plan process and through the consideration of planning applications. • Habitats Regulations Assessments have been undertaken (see Examination Library Ref 7.1 to 7.3). There are no Air Quality Management Areas (AQMAs) identified in the Staffordshire Moorlands. • 10% slippage allowance has been applied to commitments and this has been reflected in the 5 year housing land supply in the HIS. Data indicates that between 1.2% and 11.6% of permissions have lapsed between 2014/15 and 2016/17 so therefore the 10% slippage allowance is higher
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			<p>housing and provision that any application to change planning permission from affordable housing to market housing would result in the cancellation of all the permission granted at the site.</p> <ul style="list-style-type: none"> • Support: <ul style="list-style-type: none"> • Employment tourism policy - proposed change of wording • Policy DSL2 • Policy DSR3 – para 28 and 29. • Policy DSB1- para 30. support the recommendation in the first sentence as to paragraph 11. Believe there has been a lack of genuine consultation with residents and those views have not been given proper weight. Inspector should advise SMDC to carry out a new and full public consultation before he reaches his decision. • Green Infrastructure Designations. Vast majority of residents would regard LGS ‘ as demonstrably special to a local community’. Residents [may] feel that they have been entirely excluded from the Impact Study an opinions ignored. 	<p>than the average rate.</p> <ul style="list-style-type: none"> • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. <p>Recommendation: No change proposed.</p>
18	D J Williams	General comments	<ul style="list-style-type: none"> • Public doubt that 6080 homes are actually required. Disposition across district is questionable. • Only 2847 dwellings are allocated (46.82% of the total). Inspector has worsened the position by questioning BDNEW area to 2257 or 37.15% of the total. • This means that 63% of new homes will be subject to a ‘free for all’ planning approach. The vast majority of which will end up in the rural areas especially since development boundaries are to be removed from smaller villages. • This policy has the potential to create urban sprawl in the countryside. Blythe Bridge and Forsbrook is an example of where this has happened although it has the benefit of reasonably good public services and public transport. • Foxt does not have good public services yet there has been a large increase in new homes being granted planning permission. • Large-scale development such as that proposed at Moneystone Quarry as well as undesignated new homes is not sustainable. • Non-allocated housing element of the Local Plan should be rejected and 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. The spatial strategy policies including the smaller villages were discussed at the examination hearing sessions and written representations considered. • In addition to the 2,847 dwellings (46.82%) allocated in the Submission Version Local Plan 2,121 dwellings (34.88%) have been built or have planning permission granted. There is also a Peak Park allowance of 100 dwellings.

			<p>reconsideration given to preparing a new version of the Local Plan, with just a small windfall allowance.</p>	<p>Together these account for 83.35% of the gross housing requirement.</p> <ul style="list-style-type: none"> The windfall allowances set out in Local Plan Policy SS3 reflect past trends and background information on Windfall Allowance and Justification is provided in Examination Document EL7.002. The policy approach to windfall is more positive than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward. <p>Recommendation: No change proposed.</p>
19	Bond Planning (D Evans)	General comments	<ul style="list-style-type: none"> According to the HIS that at March 2018 there was a shortfall of 662 housing completions which is not expected to be corrected until 2021/2022. Considered that this timescale is unacceptable and may not be correct when sites have been discarded. Client has put forward site BE052 for housing plus land for recreation and public open space. The site was considered as a housing option in a previous version of the plan but subsequently dropped for what appears to political rather than planning reasons. The only Green Belt site now included is one that is owned by Homes England. The case for exceptional circumstances is questioned when all the other Green Belt sites have been dropped. In terms of the site specific constraints list put forward in Section 12 of the HIS there are few constraints associated with the site. The site is deliverable, viable and will provide community recreational facilities. A letter of interest from a developer is submitted. 	<ul style="list-style-type: none"> The consultation is focussed on the HIS and other supporting evidence. The spatial strategy policies including the larger villages and allocations in the rural area have already been considered at the examination hearing sessions and through written representations. Inspector’s post hearing advice does not refer to the allocation of housing sites in the Rural Area being unsound

			<ul style="list-style-type: none"> • The site allocations document has failed to identify where housing in Brown Edge should go despite previously identifying two sites and accepting that the Green Belt boundary should be amended. Remains unclear why Brown Edge will rely on windfall. • Need for new housing has been demonstrated through the Neighbourhood Plan (NP). The emerging NP is supported by a Housing Need Assessment (HNA) which concludes the need for 83 dwellings over the plan period (6 dwellings per annum). • Need for new housing to support local facilities. The post office is closing, the local newsagent closed recently and the Public House is in danger of closing. • The plan does not provide for the numbers of houses needed to meet the extant shortfall and longer term needs of the district and is therefore unsound. 	<p>and that alternative sites should be considered.</p> <ul style="list-style-type: none"> • The allocation of new housing sites would not improve the initial shortfall in the trajectory because of the lead in times required to deliver them. Sites with planning permission granted provide short-term housing supply in the trajectory. • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. • The Local Plan provides Neighbourhood Plan housing requirements . <p>Recommendation: No change proposed.</p>
20	Emery (Wain Homes)		<ul style="list-style-type: none"> • The trajectory identifies a 412 home shortfall over the plan period- additional sites should be allocated to meet this need as Staffordshire Moorlands is a green belt district and the Framework requires that boundaries should be permanent and endure beyond the plan period. • The shortfall against the plan requirement means the plan provides zero flexibility and windfall allowances are already included, contrary to the framework. • The Councils latest evidence does not support the trajectory or alter the evidence put forward at the examination. Conclude that the trajectory is unrealistic and therefore additional sites are required. • The land off Wardle Gardens Leekbrook should be allocated for residential development and would assist in addressing a number of soundness issues. 	<ul style="list-style-type: none"> • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. • 10% slippage allowance has been applied to commitments and this has been reflected in the 5 year housing land supply in the HIS. Data indicates that between 1.2% and 11.6% of permissions have lapsed between 2014/15 and

			<p>It is within the existing settlement boundary and has previously had permission for employment use.</p>	<p>2016/17 therefore the 10% slippage allowance is higher than the average rate.</p> <ul style="list-style-type: none"> • The NPPF states that LPA's may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Background information on windfall allowance and justification is provided in Examination Library doc EL7.002. • The Council has adjusted the housing trajectory based on evidence submitted at the examination hearing sessions. Lead in times and delivery rates are also supported by responses to the HIS consultation from/on behalf of Persimmon Homes, St Modwen Homes and CBRE Limited. • The allocation of new housing sites would not improve the initial shortfall in the trajectory because of the lead in times required to deliver them. Sites with planning permission granted provide short-term
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				<p>housing supply in the trajectory.</p> <p>Recommendation: No change proposed.</p>
21	Emery (Mrs & Mrs Webb)		<ul style="list-style-type: none"> • The trajectory identifies a 412 home shortfall over the plan period- additional sites should be allocated to meet this need as Staffordshire Moorlands is a green belt district and the Framework requires that boundaries should be permanent and endure beyond the plan period. • The shortfall against the plan requirement means the plan provides zero flexibility and windfall allowances are already included, contrary to the framework. • The Councils latest evidence does not support the trajectory or alter the evidence put forward at the examination. Conclude that the trajectory is unrealistic and therefore additional sites are required. • Alternative site at Biddulph Moor which would assist with addressing a number of soundness issues. It would accord with the Councils evidence on green belt and it was proposed as a draft allocation 	<ul style="list-style-type: none"> • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. • 10% slippage allowance has been applied to commitments and this has been reflected in the 5 year housing land supply in the HIS. Data indicates that between 1.2% and 11.6% of permissions have lapsed between 2014/15 and 2016/17 therefore the 10% slippage allowance is higher than the average rate. • The NPPF states that LPA's may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Background information on windfall

				<p>allowance and justification is provided in Examination Library doc EL7.002.</p> <ul style="list-style-type: none"> • The Council has adjusted the housing trajectory based on evidence submitted at the examination hearing sessions. Lead in times and delivery rates are also supported by responses to the HIS consultation from/on behalf of Persimmon Homes, St Modwen Homes and CBRE Limited. • The allocation of new housing sites would not improve the initial shortfall in the trajectory because of the lead in times required to deliver them. Sites with planning permission granted provide short-term housing supply in the trajectory. <p>Recommendation: No change proposed.</p>
22	Knights (Harlequin Development Strategies)		<ul style="list-style-type: none"> • Lead in times are to optimistic – refers to Litchfields study “Start to Finish”. LPA assumptions about start on site are not the same as completions on site. Includes discussion on individual sites. • Trajectory out of date and unrealistic. Concern over the identified shortfall and high level of windfalls required. Main modification should identify 	<ul style="list-style-type: none"> • The Council has adjusted the housing trajectory based on the evidence submitted at the examination hearing sessions and to reflect the Inspector’s

		<p>additional sites to make up the shortfall.</p> <ul style="list-style-type: none"> • The capacity identified in the SHLAA does not correspond with the windfall allowance of 30 per annum. • Small windfall sites in rural areas will not deliver the necessary affordable homes. More sites should be identified in the rural areas • No evidence submitted to support the delivery of 7 homes per annum in the National Park nor any housing need studies to support the NP policy of only allowing housing to meet local need. 	<p>post hearing advice to add in a slippage allowance of 10%. Data indicates that between 1.2% and 11.6% of permissions have lapsed between 2014/15 and 2016/17 therefore the 10% slippage allowance is higher than the average rate.</p> <ul style="list-style-type: none"> • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. • The NPPF states that LPA's may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. • The windfall allowances set out in Local Plan Policy SS3 reflect past trends and background information on Windfall Allowance and Justification is provided in Examination Document EL7.002. The policy approach to windfall is more positive than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward.
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				<ul style="list-style-type: none"> Local Plan Policy H3 allows affordable housing on suitable rural exceptions sites. Peak District National Park evidence is provided in Examination Library document EL7.004. <p>Recommendation: No change proposed.</p>
23	Persimmon Homes	HIS	<ul style="list-style-type: none"> Confirms a hybrid planning application on land known as Cheadle North (SMD/2018/0180) referred within the Submission Version Local Plan as Site Allocation DSC1 (CH001 & CH132). Currently owrking with the Council to agree matters prior to preceeding Development Control committee in March 2019. Due to recent changes to the illustrative Masterplan submitted as part of the planning application Persimmon are seeking planning consent to 275 homes which is considered to be achievable having regard to technical constraints and mixed use nature of the allocation site. Supports delivery assumptions for Cheadle North as set out within the housing trajectory. Considers 40 dwellings per annum to be an achievable rate of build. Request that the Council update the housing trajectory to reflect the above to ensure consistency and a realistic and robust housing land supply. 	<ul style="list-style-type: none"> The Council has adjusted the housing trajectory based on the discussions held at the examination hearing sessions. Planning application is currently pending consideration. Base date of the trajectory is 31/03/2018. <p>Recommendation: No change proposed.</p>
24	CBRE Limited (Ollerton Estates LLP)	Housing Trajectory & HIS	<p>In terms of the draft allocation DSL2, Land at the Mount, Leek:</p> <ul style="list-style-type: none"> Continue to support the allocation of the site and can demonstrate that new-high quality housing can be delivered within 5 years. Development statement and illustrative masterplan has been jointly prepared with Staffordshire County Council and previously submitted. Housing trajectory is considered to be realistic and broadly supported. Considered that delivery of LE128 could comfortably commence in 2021/2022. Notes the identified barriers to developing houses set out on page 17 of the 	<ul style="list-style-type: none"> Support noted. The Council will work with stakeholders to establish an appropriate means of fulfilling the masterplanning requirements. Comment about LE128 and work to bring it forward quickly is noted .

			<p>HIS however further clarity is sought on the matter of the coordinated masterplanning of larger allocations (including land at the Mount) and how the Council will expedite the endorsement process?</p> <ul style="list-style-type: none"> • HIS Appendix 1 notes that LE142b is deliverable within 2 years. Given the advanced work that has been undertaken at LE128, the Council should also consider that this site is capable of delivering housing within 2 years. 	<p>Recommendation: Amend Appendix 1 reference to The Mount to say LE128 is capable of commencement within 2 years.</p>
25	Turley (St Modwen Homes)	HIS	<ul style="list-style-type: none"> • St Modwen Homes support the continued allocation of 300 dwellings at Blythe Vale as identified in the HIS and Updated Housing Trajectory (Appendix 4) and are committed to the future delivery of residential development at Blythe Vale. • Supportive of the implementation of the first 25 dwellings at Blythe Vale during 2018/2019 period. The trajectory then assumes the total allocation of 300 dwellings at Blythe Vale will be delivered in full by 2024/2025 at a rate of 50 dwellings per annum. Implementation of the first phase of the delivery of the 300 dwellings has commenced in line with the expected 2018/2019 start date and it is expected that the scheme will be built out hereafter at the required rate of 50 dpa from 2019/2020 to 2024/2025. • Planning application to increase the number of dwellings from 118 to 146 currently under consideration. Any grant of planning permission for this scheme will continue to support housing in line with the HIS Updated Housing Trajectory. The second phase of residential development is already supported by planning permission for an access road and associated drainage and infrastructure (SMD/2018/0443). <p>Amend:</p> <ul style="list-style-type: none"> • SMD/2017/0512 as an ‘unimplemented planning approval’ on page 15 to state that delivery has now commenced. • Appendix 1 of the HIS which states that circa. 182 dwellings are allocated at Blythe Vale. For clarity this should be corrected to state that 300 dwellings are allocated or alternatively clarified that the 182 dwellings quoted are the residual number of allocated dwellings, after taking into account the planning permission for 118 dwellings at Blythe Vale. 	<ul style="list-style-type: none"> • Support noted. • Planning application is currently pending consideration. Base date of the trajectory is 31/03/2018. • Amend HIS Appendix 1 to clarify that the 182 dwellings quoted are the residual number of allocated dwellings after taking into account the planning permission for 118 dwellings. <p>Recommendation: Amend HIS wording Appendix 1 to clarify housing numbers on the site with planning permission and within remaining allocation.</p>
26	CBRE Limited (United	HIS	<ul style="list-style-type: none"> • United Utilities aim to proactively identify future development needs and share our information. This helps: 	<ul style="list-style-type: none"> • BDNEW has not been included in the housing trajectory in the

	Utilities)		<ul style="list-style-type: none"> • ensure a strong connection between development and infrastructure planning; • deliver sound planning strategies; and • inform our future infrastructure investment submissions for determination by our regulator. <ul style="list-style-type: none"> • Note in the Inspector’s post hearing advice the recommendation to delete BDNEW in Biddulph. Should the Council be considering alternative sites, we would continue to direct you to our past representations. The position remains unchanged. • These raised a range of issues such as the importance of the site selection process having regard to sites securing foul only connections to the public sewer and the importance of following the surface water hierarchy. Also note that it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to wastewater treatment works. This reflects guidance in the NPPG at para 005 Reference ID: 34-005-20140306. • United Utilities would welcome the opportunity to discuss the selection of additional sites with the Council should the Council be considering alternative sites so that we can provide our early comment on any issues that may arise. • Request that the Council continues to consult with United Utilities for all future planning documents. 	<p>HIS in order to reflect Inspector’s post hearing advice.</p> <ul style="list-style-type: none"> • Sites in Biddulph are subject to separate consideration. <p>Recommendation: No change proposed.</p>
27	P Cowie	General comments	<ul style="list-style-type: none"> • The draft Local Plan still requires around 2121 to be allocated in the villages and rural area. The character of the Staffordshire Moorlands is the villages and the countryside between them. Believe that the special landscape will suffer from the introduction of buildings on this scale. • Problem exacerbated by the prospect of dispensing with development boundaries in the 20 designated small villages. The NPPF proposes that urban sprawl should be avoided and villages should not encroach onto other villages. • Green Belt and open countryside should be safeguarded. Concern for the prospect of over development in the villages and rural area where the local transport infrastructure will need to undergo drastic revision to provide for a 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. • The spatial strategy policies including the smaller villages and housing need were discussed at the examination hearing sessions and written representations considered. <p>Recommendation: No change</p>

			<p>consequent population increase.</p> <ul style="list-style-type: none"> • 2012 ONS Sub-National Population indicated a levelling off of the population in the district which would reduce the housing need. Also bringing empty properties back into use will also reduce need for new housing. 	<p>proposed.</p>
28	J Steele	General comments	<p>With regard to the HIS and other housing evidence:</p> <ul style="list-style-type: none"> • Rural area would have to accommodate 37% of total allocation. • Concerns regarding concept of sustainability. Refers to a pending planning application at Winnothdale. • Rural development is compromised by the attempt to remove village boundaries. Believes this will lead to a planning free for all with developers cherry picking the best sites and failing to provide the infrastructure required. • Unable to grasp how job creation is used to justify more housing? Are we building houses to facilitate jobs growth or will jobs growth require more housing. View that this element of the plan has no provable substance and should be discarded. • Support the Inspector's views as regards the longevity of the Green Belt boundaries. 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. • The spatial strategy policies including the smaller villages and housing need were discussed at the examination hearing sessions and written representations considered. <p>Recommendation: No change proposed.</p>
29	S J Malpass	General comments	<p>With regard to Blythe Vale:</p> <ul style="list-style-type: none"> • Almost a 'Blythe Bridge Two' situated alongside good access but currently very busy roads that will bring the usual impact and problems. • Concerned about its location compared to more sustainable smaller sites offering easier walkable access to local facilities and to the railway station. May be only 0.7km from the station but walking or cycling would involve crossing busy roads. • Hope that the Council will be encouraged to revisit some of their 'Green Belt' policy sites and be more flexible to make use of ideal sites. 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. • Inspector's post hearing advice does not refer to the allocation of the Blythe Vale site being unsound and that alternative sites should be considered. • The Green Belt and the Blythe Vale site were discussed at the examination hearing sessions and written representations considered.

				<p>Recommendation: No change proposed.</p>
30	G Willard	HIS	<ul style="list-style-type: none"> • Dismayed that the Inspector has recommended a ‘wait and see approach’ in terms of rural settlement boundaries. Failure of the Council to allocate any new rural housing sites for the past 20 years. Cannot continue to engage in a preparing a plan that does not make provision for the whole of the plan period. • Lack of delivery and this will be worsened by the failure to allocate sites for main villages and leaving the provision of new housing to windfall delivery on small sites. Plan is unsound if it cannot deliver sufficient affordable housing. • Also how can it practically and realistically increase the supply of housing suitable for an ageing population? There needs to be a clearer and more positive policy to deliver specialist and older persons housing across the district. • Need for small sites adjacent to towns and villages to build self and custom build dwellings. A revised Policy H1 may assist but this needs to be positively applied. • Projected windfall rates are supported by past windfall rates. Flawed because finite supply of sites and opportunities will decrease. Should be a reasonable reduction in projections to account for this. Also much of the district is covered in Green Belt and high landscape value. • Problem of planning for housing will be amplified if the Council fail to find a replacement for BDNEW and are in danger of preparing a plan that is unsound from the start. • Council considers that it has achieved some good affordable housing outcomes between 2009 and 2015 which is down to the sites being owned by the public sector and social housing partners and generous government funding. • The Accelerated Housing Delivery Programme has much to prove as it is doubtful that government funding will be as generous, there will be significantly less public sector financial support and will look at unimplemented planning permissions. • If serious about addressing affordable housing needs SMDC should more 	<ul style="list-style-type: none"> • The consultation is focused on the HIS and other supporting evidence. The wider spatial strategy, larger /smaller villages (including infill boundaries), self build/ custom build, viability and affordable housing policies were discussed at the examination hearing sessions and written representations considered. • The NPPF does not require that local plans identify a supply of sites for years 11-15 of its life. • The Strategic Housing Market Assessment (SHMA) provides more detail about housing needed by older people (Examination Documents 27.1-27.6). Local Plan Policy H1 also requires that housing developments should aim to provide flexible accommodation which is capable of future adaptation. • The windfall allowances set out in Local Plan Policy SS3

			<p>fully engage with the private sector to allocate sufficient housing sites especially in Biddulph and the larger villages and to allocate housing sites which can deliver viable affordable housing.</p> <ul style="list-style-type: none"> • Appendix 1 – The comments from agents or landowners about site delivery should be treated with a degree of scepticism. Viability and personal circumstances of landowner / business need to align for a site to be delivered. It is highly likely that not all allocated sites will be delivered at any stage in the plan process. • Appendix 9 – Table is skewed by permissions in Cresswell and Upper Tean as a result of the Council not being able to demonstrate a 5 year supply. No likelihood of Policy H1 delivering sufficient rural housing in the future given Green Belt, local politics, uncertainty within the policy itself and a newly adopted plan. • Appendix 10 – lack of recent approvals in Biddulph and Leek. When compared with other adjoining council's there is a clear and palpable lack of development activity. This is because property prices lag behind other areas but development costs are similar. This is why agents and developers working in the area are promoting more allocations in the rural areas because they know how difficult it is to bring forward and deliver viable housing and development sites in the district. 	<p>reflect past trends and background information on Windfall Allowance and Justification is provided in Examination Document EL7.002. The policy approach to windfall is more positive than that set out in the Core Strategy which sought to place a cap on the size of windfall sites that could come forward.</p> <ul style="list-style-type: none"> • In addition to the introduction of the Accelerated Housing delivery Programme the HIS outlines the considerable progress that the Council has already made, working with partners to bring development forward. • The Local Plan will provide a 5 year supply of housing on adoption which be reviewed on an annual basis. • The Council has adjusted the housing trajectory based on the evidence submitted at the examination hearing sessions and to reflect the Inspector's post hearing advice to add in a slippage allowance of 10%. Data indicates that between
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				<p>1.2% and 11.6% of permissions have lapsed between 2014/15 and 2016/17 therefore the 10% slippage allowance is higher than the average rate.</p> <p>Recommendation: No change proposed.</p>
31	D Walters		<ul style="list-style-type: none"> • Questions the focussed approach to the consultation on the HIS and other housing evidence. Notes that there may be an opportunity later this year for consultation on the draft plan. Concerned that the amount of changes proposed to the plan are complicated to follow and it will be altered so much from the earlier version that people responded to in good faith. • Support the issue of Green Belt at Biddulph although concerned that this may be added to the rural allocation as a result in conjunction with the recommendation to remove the small village boundaries. • The removal of these small villages boundaries will transform the ability of planners to control development in areas of sensitive or special landscape areas and result in the risk of altering the local landscape characteristics. The blurring of the village envelope will mean more development in the rural landscape and the purpose of defining smaller and larger villages will be made obsolete. • Consider this will satisfy the developers and the Council's housing targets and revenue but the prospect of loss of local character and undermining the AONB status that the Council is seeking seems a high and irrational price. • Lack of infrastructure to support new housing, particularly in the rural area. This is unsustainable and contrary to what the plan is seeking to achieve. • In the rural areas there is a lack of or no public transport. This impacts on air pollution, increased volume of traffic, no longer schools or shops, main hospitals Stoke or Derby. • The provision of affordable rural housing has not been properly addressed. This is an area that needs more stringent policing not just to suit developers pockets. 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. • The spatial strategy policies including the smaller villages, other rural areas, infrastructure and affordable housing were discussed at the examination hearing sessions and written representations considered. • Consultation on a final list of Main and Minor Modifications to the Submission Version Local Plan will take place in due course. <p>Recommendation: No change proposed.</p>

			<ul style="list-style-type: none"> • Not enough local discussion has been stimulated during the Local Plan preparation process. • If boundaries are to be removed they must be defined accurately in the first place. Refer to previous comments sent to SMDC. No further evidence of alterations or corrections to the plan. 	
32	D Merry	HIS	<ul style="list-style-type: none"> • Note from the HIS that the 2 anonymous developers have already managed to obtain £1.7m and £2.7m each. ? • Question public consultation and the Council’s response. • Concerned about local ground stability. • Need for starter homes for younger people. • Concerned about the smaller village boundaries being removed to make way for more development. • Facilities and services in the smaller villages are limited. 	<ul style="list-style-type: none"> • The council has worked with two developers of specific sites for funding bids to support viability gaps which would mean schemes would otherwise not progress. The Council is happy to help any other developers facing similar viability issues. • The consultation is focussed on the HIS and other supporting evidence. The spatial strategy policies including the smaller villages and housing need, including affordable housing were discussed at the examination hearing sessions and written representations considered. • Details regarding previous consultation stages can be found in the Examination Library Consultation Statement Refs 5.1 – 5.3. • Comments in relation to challenges and barriers in section 12 of the HIS are noted. Consider that land

				<p>instability / mining legacy could be added to the list of 'Site Specific Constraints' on page 17.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • Add further text to Amend Site Specific Constraints box on page 17 of the HIS to include 'land instability / Mining legacy'. • Add further text to last row in table on page 20 of the HIS to include 'The Council are happy to help other developers facing similar viability issues which would mean schemes would otherwise not progress'.
33	J M Belcher	General comments	<p>With regard to Blythe Vale:</p> <ul style="list-style-type: none"> • Council seems blinkered to review other micro sites on the doorstep to Blythe Bridge railway station bringing far greater benefits of social and sustainable infrastructure with a lesser detrimental effect on the environment. • The Green Belt review completely dismisses micro sites close to Blythe Bridge services and facilities. Land in the same vicinity has been developed more recently and it is considered that Green Belt parcels on the urban fringe should be reviewed. 	<ul style="list-style-type: none"> • The consultation is focussed on the HIS and other supporting evidence. • Inspector's post hearing advice does not refer to the allocation of the Blythe Vale site being unsound and that alternative sites should be considered. • The Green Belt and the Blythe Vale site were discussed at the examination hearing sessions and written representations considered.

				Recommendation: No change proposed.
34	Biddulph Neighbourhood Plan Group (Late response)	General comments	<p>In relation to doc EL6.005 a letter from SMDC to the Inspector:</p> <ul style="list-style-type: none"> Note para 8 which refers to the deletion of BDNEW from the plan without the deficit in housing supply being made up elsewhere. Support a considered approach, that includes clarifying that sufficient land is currently available and viable within the existing sites allocated in the emerging Local Plan. Note the opportunity of existing sites that remain, and that the density may increase to accommodate some additional numbers, which provides further contribution to the total housing numbers in the district. The emerging Local Plan (when adopted) will be reviewed within 5 years and this could call for additional sites, if required. Consider it would be more expedient to provide a clear rationale, and proceed with the document as it stands with the removal of this one site; its cumulative impact on numbers throughout the District is minimal. Recent planning decisions have granted permission for larger numbers of homes exceeding 50 units on land not allocated for housing or identified through the Local Plan Process or Neighbourhood Plan processes. Therefore, it would be reasonable to assume that speculative development of medium or large-scale development will continue across the District while there is not a robust and up-to-date Local Plan. The emerging Local Plan states that the total housing provision for Biddulph Town will be 890 new units. The evidence base from the emerging Neighbourhood Development Order is identifying where existing buildings within the Town Centre can be better utilised to include first floor residential accommodation, which will create new residential dwellings and help to revive the Town Centre. The emerging Neighbourhood Development Plan will be submitted for screening in Spring 2019 and undertaking Regulation-14 later this year. The draft policies within the plan support sustainable development and growth with supported infrastructure. This evidence base could be used to further support the case of continuing with the emerging Local Plan, removing this 	<ul style="list-style-type: none"> The consultation is focussed on the HIS and other supporting evidence. Sites in Biddulph are subject to separate consideration. The Local Plan makes an allowance for windfall sites in Biddulph (see evidence provided in Examination Library ref no EL7.002.) It is considered that a 5 year supply of housing land will be available on adoption of the Local Plan. <p>Recommendation: No change proposed.</p>

			one site and through a range of Local and Neighbourhood Plan policies and the Neighbourhood Development Order, encourage development on existing sites identified, increasing the densities to provide accommodation to meet Biddulph's housing need and create new accommodation in the Town Centre in existing buildings.	
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