

Summary of responses to Staffordshire Moorlands Local Plan Main Modifications consultation

ID	Full Name	Organisation Details	Agent Name	Agent Organisation	MM Ref	Legally compliant ?	Positively prepared?	Justified ?	Effective ?	Consistent with national policy?	Complies with the Duty to co-operate?	Summary of response	Officer Response	Recommendation
MMC110	Ms Melanie Lindsley	Planning Liaison Manager The Coal Authority										I can confirm that the Coal Authority has no specific comments to make on the Main Modifications proposed	Comments noted.	No change.
MMC116	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership								Concern regarding consultation on main modifications undertaken at the same time as a new housing land supply statement. The hearings should be re-opened to interrogate the new evidence.	Matter for Inspector	Not applicable.
MMC156	Mr Martin Webb		Mr Coxon	Emery Planning Partnership								Concern regarding consultation on main modifications undertaken at the same time as a new housing land supply statement. The hearings should be re-opened to interrogate the new evidence.	Matter for Inspector	Not applicable.
MMC524	Mr & Mrs S & C Fielding											<p>In the 35 years that I lived in Portland Drive I have studied the wildlife in our field with joy and kept diaries. Nowhere have I seen so many animals [etc].</p> <p>We have the return of the kingfishers, bats, owls, protected hedgehogs. Many of the [older] residents have taken a great interest.</p> <p>At the moment there are please..from the wildlife organisations to provide sanctuaries for wildlife and to plant trees [for] cleaner air.</p> <p>Valley was once part of Biddulph forest ..keep it that way.</p> <p>No one would choose to buy 200k house on a serious floodplain without [possibility] of mortgage or house insurance, next to sewage farm. The Council would not build there knowing problems and social housing would not be good planning..</p> <p>..Costs of alterations far outweigh the costs of the houses..question who pays for this.</p>	<p>Refer to officer response to MMC179.</p> <p>Ecological evidence has been gathered for the areas proposed for safeguarding. (Documents 14.1 and 14.8 in the Examination Library). However, as these sites are not proposed for development during this plan period, more ecological and other supporting evidence would be needed at any such time that they were considered for a possible housing allocation. If necessary, Policy SS6 could be modified to clarify the fact that further detailed consideration of planning matters, including ecology, would be required</p>	Refer to recommendation within MMC256.

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													<p>to inform a future Local Plan review.</p> <p>These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, highways / access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323).</p> <p>The site boundaries have been drawn to exclude land in the flood plain.</p>	
MMC530	Mr & Mrs S & C Fielding											<p>One of the major issues for [BD068/BD087/BD083] is access. Marsh Green Rd is widely considered to be one of the most dangerous roads in Biddulph, especially Congleton Rd junction. Access to Congleton Rd can take a number of minutes as..2 blind summits either side of exit. As most houses have 2 cars this could mean 225+ cars using exit.</p> <p>[The landowner's] plan to widen and straighten [a] winding country lane..leading into Gillow Heath..would destroy the whole character of the area.</p> <p>Northern end of Biddulph [contains] Biddulph Grange [and] ancient church..</p> <p>During the summer the traffic increases with tourism adding to the problem at MG Rd junction. There would also be increase in noise and pollution seriously damaging..neighbourhood and wildlife habitat.</p> <p>Biddulph Valley/Biddulph Valley Way are</p>	Refer to response to MMC486.	Refer to recommendation to MMC486.

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												widely acknowledged as beauty spots...These would be lost [question] at what cost. Only green belt left..would be sewage plant.		
MMC537	Mrs Kathleen Boulton											<p>Objections to the proposed housing development off Marsh Green Road.</p> <ol style="list-style-type: none"> 1. the infrastructure of Biddulph is not able to meet the demand placed on it by any extra development. The sewage works [currently] cannot cope. Smell so bad..they spray..artificial perfumes. Constant droning keeps people awake at night.. Am currently considering appeal to noise abatement authorities. Warmer weather will..make things worse. [Occasionally] effluent leaks into ground [quick sand] where houses would be built. Is marshland. 2. Access road is narrow and dangerous to traffic and [widening] would..mean compulsory purchase of land from other properties. 3. the project will mean loss of green beltland, the destruction of mature trees [this has already commenced] - question global warming/carbon storage, loss of habitats of endangered and protected species. 4. Schools and medical facilities are overstretched. Additional resources are not the answer...Medical centre is white elephant..unable to recruit staff [etc]. 5. Area is undermined and in the past subject to earth tremors which could affect the sewage adversely. <p>It is completely shocking and an insult to our intelligence that these schemes are even being considered. Question why can't derelict in the town be converted into accommodation or simpler solutions found.</p>	Refer to MMC179.	Refer to MMC179 recommendation.
MMC533	Mr & Mrs S & C Fielding											<p>BD068:</p> <p>some details of the field..may be of interest.</p> <ol style="list-style-type: none"> 1. It's a serious flood plain. Evidence..of flooding to over 4.5foot and [very recently] breaking its banks in several places ending with gushing water through the little [access] bridge on Marsh Green Rd. 	Refer to MMC179 response.	Refer to recommendation within MMC256.

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												<p>2. it's next to main sewage farm which in heavy rain can leak into the flooding brook contaminating the water and land. This means BD068/BD087 are contaminated and unsuitable for development. Smell from sewage works in summer. [The landowner's] inspection was taken in May - [not] the hottest month. The [sewage works] is noisy [especialy] in summer..</p> <p>3. The field was once the site Victorian horse fair [tetanus risk]...</p> <p>4. We are called marsh Green for good reason.</p> <p>5. Gillow Heath is a plague village and fields around had plague pits [question if disease is merely dormant]..</p> <p>6. Main sewage pipe lies the length of the field..not far below surface..Question how far foundations would have to go in [this marshy ground]..</p> <p>7. The mound at the MG Rd end of the field is where the cattle carcasses from 1968 foot and mouth epidemic. This would have to be cleared at..cost.</p> <p>8. Underground streams run down from Biddulph Moor to the brook causing some houses to have soakaways and pipes... Any alteration to the brook cannot stop this..</p> <p>9. [As] a marshy field [there are problems] with midges. The only [landowner] inspection of this was made [at wrong time of year].</p> <p>Water is the main problem in our field yet there is no mention of BD068 flooding in [landowner's] report. The alterations needed on [site] and [the] road would cost more than the houses.</p>		
MMC523	Mr & Mrs S & C Fielding											<p>BD068:</p> <p>To sum up why [you should not] build on BD068:</p> <p>1. It can easily flood. Have seen water half way up Essex Drive back gardens, 4.5 foot deep. Have seen [access] bridge gushing with as much water as it could take [very recently].</p>	<p>Refer to officer response to MMC179.</p> <p>Ecological evidence has been gathered for the areas proposed for safeguarding.</p>	<p>Refer to recommendation within MMC256.</p>

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												<p>The brook can break its banks in moderate rainfall.</p> <p>2. The field is bordered by the sewage works which can overflow into brook contaminating the water and land - you don't build on contaminated land. In warmer weather it smells.</p> <p>3. Creating access to the fields very expensive, not easy, and would cause mayhem in Marsh Green Rd, adding 250+ extra cars.</p> <p>4. Tetanus, plague, foot and mouth all associated with BD068.</p> <p>5. [Cannot] eradicate midges.</p> <p>6. Our wildlife in great danger and we have a wonderful sanctuary in the field. [The landowner] has threatened to obliterate this.</p> <p>7. the main sewage pipe runs down one side of the field not far below surface.</p> <p>8. Marshy ground [will necessitate] deep foundations adding cost to the houses.</p> <p>9. This is a tranquil place enjoyed by people from Biddulph/surrounding areas.</p> <p>Believe there is a stipulation that if landscape would be ruined then development would not be permitted. Question why green belt up for grabs when there are 27 other areas available. Build on this and all we have left is sewage works.</p>	<p>(Documents 14.1 and 14.8 in the Examination Library). However, as these sites are not proposed for development during this plan period, more ecological and other supporting evidence would be needed at any such time that they were considered for a possible housing allocation. If necessary, Policy SS6 could be modified to clarify the fact that further detailed consideration of planning matters, including ecology, would be required to inform a future Local Plan review.</p> <p>These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, highways / access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323).</p> <p>The site boundaries have been drawn to exclude land in the flood plain.</p>	

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MMC525	Mr & Mrs S & C Fielding											<p>Question why have all the decisions made in 2016 giving us a 15 year stay on development because the field was totally unsuitable for building, been completely reversed. Can understand one or two being changed but [not] all of them..</p> <p>Question why when United Utilities wanted not to develop the fields, have they reneged on this (without alterations) even though we have evidence of sewage overflow. If development [went] ahead they would have to extend sewage works as [already] at full capacity. This would bring works closer to the houses increasing the problems, and expense. Question who would pay for it.</p>	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC552	Raymond Berringer											See response to MMC551.	See response to MMC551.	No change.
MMC580	Mr Dennis Weston											<p>Some 30 years ago members of my family purchased the 'Mayfield' property, Stanley Rd Stockton Brook and [surrounding land]. The [derelict] property was considered for [planning application for] change of use for..hotel..because of [available] grants...Planners recommended approval [but]Planning Committee [refused it]. The inspector allowed the..appeal [because building became listed] and ruled SMDC..must pay all..costs. However we only received [some] costs and grant [were no longer available]..</p> <p>..I am aware a further application..submitted for house fronting Stanley Rd [was not approved].</p> <p>It is understood repair work was done on 'mayfield'..to stop it falling down..to date..never completed..and has become a case of throwing good money after bad.</p> <p>At the initial stages of [Local Plan] we were aware housing had been recommended on part of [Mayfield land holding]..for housing development and already..[benefitted from].. a proper access road..</p> <p>However the last stage of the final plan..Mayfield [was] deleted..without any known reason [despite being] a blot on the landscape..crying out for rejuvenation..due to</p>	Comments noted. Note this representation raises issues previously discussed at the examination and does not pertain to any of the published Main Modifications.	No change.

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												<p>[site] dereliction.</p> <p>In contrast a garden site at Endon is included in final Plan..therefore making the final plan unsound in the extreme when a comparison is made with..[Mayfield]..site. Not including Mayfield site amounts to an abuse of process of the final Local Plan..</p> <p>I have previously made representations..about Mayfield not being [included]..</p> <p>..Little doubt that Mayfield has cost [my] family..a lot of money and that SMDC are to blame..</p> <p>Hope this letter will lead to further consideration of Mayfield site which was initially proposed for housing and it is considered a wider spread of housing would mean less 'grid lock' in the towns.</p>		
MMC41 Q	Mr R Goodall				[Not stated]							<p>Suggest that the monitoring review [period] for the Local Plan be in line with NPPF because the current Blythe Bridge situation favours the increasing size of..Blythe Vale. The size [and housing yield] of this site restricts other potential..opportunities in Blythe Bridge.</p> <p>At the moment there is a great need for housing in the countryside which supports rural diversification and sustainability.You need to revisit overlooked green belt sites [in Blythe Bridge] which support a reduction in co2 emissions by just utilising better transport links.</p> <p>You need to ensure a five year supply is maintained and engage with landowners, developers in order for potential sites (with better amenities/transport links) to be brought [forward].</p>	Comments noted. Note this representation raises issues previously discussed at the examination and does not pertain to any of the published Main Modifications.	No change
MMC42 Q	Mr Robert Simcock				[Not stated]							<p>Mr Robert James Simcock [and representative] gave formal evidence..concerning my sites BD068 and BD087..for residential [use].</p> <p>We attended all the pre-development meetings and the Core Strategy Hearings and supported the Council's proposals for the Plan. We..confirm the inspector's hearings advice to the Council regarding both sites.</p>	Comments noted. The inspector will advise whether he considers further Local Plan hearings are necessary in due course; and in the event of hearings it is the discretion of the inspector whom he	No change.

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												I have requested [my representative] submit further..particulars in the coming days [to attach to] this document.	permits to speak.	
MMC434	Mr Paul Kasperowicz				[Not stated]	No	No	No	No	No	No	<p>Have been in contact with EA regarding safeguarding of BD087. There are a number of issues..as it is the only flood plain identified in LP.</p> <p>Council stated at 26 June meeting that they used findings from 2014/2015/2016 to justify [proposals] but excluded information 2017/2018/2019.</p> <p>SMDC was requested by EA in 2015 to develop a SFRA Level 2 flood risk analysis for BD068/BD087..- in checking with EA [subsequently] this has not been completed [only SFRA Level 1].</p> <p>26/08 letter from EA to Council clearly states that all other sites should be considered before this site.</p> <p>BD062/068/087 were originally excluded during first round of consultation 2016. In modified Local Plan Council have only identified 12 sites from the original [2014] plan (originally 27 sites identified).</p> <p>A number of unique concerns with BD087 that need up front Council actions before safeguarding, or it would seem Council would know [in advance] it would potentially fail at any future consultation process.</p> <p>1.BD087 is flood plain. The only floodplain in Biddulph (flood risk Level 1,2,3); also [suffers] surface water run off. Over 50% of site is flood risk zone with both pluvial and fluvial issues [as identified on EA Flood Plan]. [Correspondence] between owner's agent and Council Sept 2017 stated housing would be on flood zone 1; also that all surface water will be directed into the brook. In 2015 the EA and United Utilities requested Council consider all other options and 27 sites before this site. EA then stated that development that increases flood risk to neighbouring land/in the catchment will not be permitted. BD087 is classified natural flood plain; current Government Policy states that all other sites should be considered first (meaning whole of Staffs Moorlands). Note EA has major</p>	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.

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												<p>concerns about Congleton area flooding - the river running through this site is major concern.</p> <p>2. Public safety issue- land proposed for access road/bridge only 1.5m above normal river height (land in FZ2/FZ3). Only access [option] for this enclosed site. Question if in flash flood will there be Emergency Evacuation Plan in place; and have emergency services been involved with site selection.</p> <p>3. The max rise of river during flash flood is 2.6m. EA have states river cannot be cultivated in order to build 6m wide single access road and bridge onto the site, a supporting wall will be required - [increasing river flow speed and therefore flood risk downstream]. Access road would be on narrow side of bank - believe that an investigation would be needed before safeguarding, to demonstrate it is actually possible.</p> <p>4. site has 13m height drop; site below water treatment works - the only direct route for surface water would be into river thus increasing speed/levels of flood waters. [As] 60% of site [would be developed] question how flow rate will be slowed down.</p> <p>5. As site is flood plain any future development] would not be capable of being insured. [With] no building insurance there would be no mortgage availability. Question who liable for public liability insurance.</p> <p>6. Strongly object to very late modification to Local Plan. The addition of safeguarded land without proper investigation (public safety issues; public consultation) could prove very expensive to Council.</p> <p>Local Plan logically unsound and legally questionable and subject to later Court challenge. Short cutting the selection process is not acceptable. Question why site deemed Level 1 building land given it was deemed unsuitable in 2016.</p> <p>Council dismiss the safeguarding of BD087 from modified Local Plan until the Planning Team have liaised with all vested interests and</p>		

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												provided all the necessary information (including SFRA Level 2 & Public Safety Risk Report).		
MMC453	Mr Paul Kasperowicz				[Not stated]	No	No	No	No	No	No	<p>Note at least 80% of all new Biddulph housing will be green belt.</p> <p>Council stated at 26 June meeting that they used findings from 2014/2015/2016 to justify [proposals] but excluded information 2017/2018/2019.</p> <p>BD062/068/087 were originally excluded during first round of consultation 2016 due to flooding and access issues. The property owner's plans dated 22/09/17 shows access roads via MG Road - a single track. Have been in contact with police who stated dangerous access road is a joke. The concerns below:</p> <ol style="list-style-type: none"> 1. Difficult to access - MG Road is single track [width varies 2.5m-4m] with 90degree bends - truck manoeuvre problems. SCC Highways described it as worst road in Staffordshire (no footpaths). A527 junction is dangerous..and will require traffic controls. Question if new road to be built who will pay for this and potential junction remodelling; and will access be built before site approvals. 2. MG Road runs east-west from the sites. Site access roads run north-south staggered either side of bridge over brook; bridge at 30% angle to road (single track bridge). Owner states in [correspondence with Council] that road and bridge will need modification - question who will pay for this. 3. MG Road to west is impossible foe HGVs (at BD087 road is 2.5m wide with 's' bends). From A527 to the sites only 4m wide(no footpath) with hidden 'dip' junction..[this road will have to be widened [to 8m width] requiring private land. Question if modifications to bridge and road by approved by SCC before sites selected for safeguarding. <p>Question who will pay for new road/junction remodelling to be built, and will it be built before the sites approved; have SCC been informed and do they have the money.</p> <p>Surprised that out of the [original Biddulph</p>	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.

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												<p>2014 sites] none of the other 27x sites are more suitable for 100 houses [with better pavements etc]. Also question what happened to the other sites.</p> <p>Object to very late modification to Local Plan for Biddulph. Addition of safeguarded land without proper public consultation, replacing 1xgreen belt sites with 3x, is not acceptable. Failure of Council to investigate other 27x sites is disappointing. I find Local Plan to be logically unsound and legally questionable and subject to [legal] challenge.</p> <p>Would ask you to find against the entire Local Plan and allow [private] market forces to decide where housing industry should be built in [District].</p>		
MMC452	Mr Paul Kasperowicz				[Not stated]	No	No	No	No	No	No	<p>I attended 26 June Local Plan meeting. The topic was to consider Local Plan modifications and implications for Neighbourhood Plans.</p> <p>This LP modification was in response to the Planners rejection of the original Biddulph housing Site Plan. This Plan was worked on for over 3 years and had backing of Biddulph Town Council and Biddulph Neighbourhood Plan Team - but had an objection raised on small area of BDNEW (green belt).</p> <p>Note that at least 80% of all new Biddulph housing will be on green belt.</p> <p>SMDC Planners stated they used 2014/2015/2016 findings to justify modified plan. This excluded up to date 2017/2018/2019 information. Little information from Biddulph Neighbourhood Plan was used (which is in final completion stages).</p> <p>SMDC Planners read from a report created without local consultation. This identified options including increasing housing density on the 2 proposed sites (made sense). Then report identified 4 safeguarding options on 3 new green belt sites (without consultation) thus replacing 1xsite (BDNEW) with 3x.</p> <p>Sites BD062/068/087 were originally excluded during 2016.</p> <p>Council had identified 12 sites from 2014 housing plan. Question what happened to the</p>	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.

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												<p>other [remainder of 27x] sites. Sites BD062/068/087 were considered at great length and excluded [in 2016] due to:</p> <p>1. BD087 is flood plain (FZs1/2/3) and also suffers surface water run off as identified in EA Flood Plan. The EA and United Utilities requested that Council consider all other options/27x sites before this site. EA then stated that development increasing flood risk to neighbouring land/catchment will not be permitted. 2016 EA letter to Council stated that a Level 2 SFRA would be required before BD068/BD087 could be considered. [To date] this has not been done. Request that Council therefore request SFRA Level 2 as part of consultation process. Maximum river rise is 2.6m. More than 50% of this site is Floodzone1/2/3 (being 15m below water treatment works). Previous siteowner correspondence with Council stated that surface water from BD068/087 would go directly into river - increasing speed/levels of flood water. EA has specifically stated river cannot be cultivated. Land proposed for site access/road bridge only 1.5m above normal river height (and is floodzone3). Note BD087 is in floodplain - current Government Policy states all other sites should be considered first (ie whole Staffs Moorlands). As site on floodplain any [subsequent development] would be [uninsurable]..Thus no building insurance and no mortgage availability to new housing. Note that EA has major concerns on flooding in Congleton area - the river here is major contributor.</p> <p>2. Difficult to access - MG Road is single track [width varies 2.5m-4m] with 90degree bends - truck manoeuvre problems. SCC Highways described it as worst road in Staffordshire (no footpaths). A527 junction is dangerous..and will require traffic controls. Question if new road to be built who will pay for this and potential junction remodelling.</p> <p>3. BD087 was considered by Biddulph Town Planning 2005 for the site of the new cemetery [but rejected] on flooding and access issues. BD087 10m below neighbouring housing; all the surface water travels onto this site in combination with river flood water - waterlogging problems.</p>		

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												<p>4. Site viability BD087 - electric substation on NE corner - telegraph poles would require access - reducing housing capacity. Question if [housing capacity reduction] means unviable.</p> <p>5. 2015 green belt report states this land [parcel N7] has significant contribution in preventing neighbouring towns merging..any development [here] would produce an over extended linear pattern with limited relationship with town. BD087 is 1.5 miles from town centre, 3 miles from high school. Question what are the exceptional circumstances for BD062/068/087.</p> <p>Strongly object to very late modification of Local Plan. Addition of safeguarded land without consultation, replacing 1x green belt site with 3x..is crazy. Failure of Council to investigate all other 26xsites, property developers using the system to exclude BDNEW for their own benefit [to safeguard BD062/068/087] - is not acceptable.</p> <p>BDNEW supported by Biddulph Town Council [because] closest to town centre [facilities] - the most environmentally friendly site..and supports town centre regeneration plan.</p> <p>Within 7 miles Congleton/East Cheshire are building around 10000 new homes..[so question]..why SMDC say Biddulph needs 965 new homes. This would mean influx into this area of up to 25000 over next 10 years.</p> <p>SMDC Local Plan logically unsound and legally questionable and subject to [legal] challenge.</p> <p>Local Plan should clearly show how it supports not only Staffordshire Moorlands but also West Midlands. The Local Plan has parochial view [which does neither]. Only major road system passing through is A50 - which if correctly developed could create an East-West Midlands industrial corridor.</p> <p>Would ask you to find against the entire Local Plan and allow [private] market forces to decide where housing industry should be built in [District].</p>		
MMC57		Natural			All MMs	Yes	Yes	Yes	Yes	Yes	Yes	Natural England has no further comments to	Support for MMs	No change

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		England										make on the Main Modifications of the Staffordshire Moorlands Local Plan.	noted.	
MMC69	Mrs Maureen Whitehurst				BD062/F ID12			No	No	No		Object to inclusion of BD062 due to: - Failing in duty to have regard to biodiversity. - Highway safety. - Flooding. - Proximity of sewage works - odour issues.	Refer to standard officer response to MMC179.	No change.
MMC304	Mr D Hawley				Doc Ref G (Wharf Road Masterplan)	Yes	No	No	No	No	No	- In the proposed option the retail industrial sites are away from the town centre. The original idea was that the industrial/retail sites should be close to the town centre which is what is required to support investment in the town centre. Also the proposed option seems to swap the school playing field and the old school. - The proposed option is not acceptable. There needs to be consultation with the town council and residents with respect to any proposal suggested. This has not yet happened.	MM39 shows the amended policy wording and supporting text for the Wharf Road Strategic Development Area. It refers to the increased number of houses which can be accommodated on the site as a result of detailed masterplan work. The layout and position of individual uses e.g. retail is not covered in the Local Plan. This is covered in the masterplan, a separate document. A planning approval will be needed for the development to go ahead so any scheme would need to be in line with the Local Plan and national planning policy. The Town Council would also have the opportunity to comment on any proposal at the planning application stage.	No change.
MMC307	Mr				Doc ref H	Yes	No	No	No	No	No	The options put forward have been done with no consultation with Biddulph Town Council or	MM41 shows the amended policy	No change.

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	D Hawley				(Tunstall Road Masterplan)							<p>residents.</p> <ul style="list-style-type: none"> - The consultation event on the options was flawed with those residents closest to the site having no idea it was taking place. - The suggested option is totally unacceptable, you cannot put industrial units next to existing housing. They need to be as far away as possible, probably backing onto Mill Hays Road. - There needs to be consultation with the town council and residents with respect to any options suggested. This has not yet happened. Then a formal consultation period. 	<p>wording and supporting text for the Tunstall Road Strategic Development Area. It refers to the increased number of houses which can be accommodated on the site as a result of detailed masterplan work and states that layout details (e.g. position of access, housing and employment uses) will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document. In any case before the site could be developed it would need planning permission and residents and the Town Council would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan.</p>	
MMC119	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM1	No	No	No	No	No	No	<p>Welcome extension of the plan period to 2033. However, due to the delay in the process, if the plan is adopted in 2019, it will only cover a period of 13 years - not 15 years as set out in the NPPF.</p>	<p>As indicated, the revised plan period reflects the evidence. Para. 157 of the 2012 only states that 15</p>	No change.

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												An extension of the plan period requires additional allocations for development but none are proposed.	period time horizon is preferable . It is not mandatory. New site allocations have not been identified as being necessary during the examination process.	
MMC159	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM1	No	No	No	No	No	No	Welcome extension of the plan period to 2033. However, due to the delay in the process, if the plan is adopted in 2019, it will only cover a period of 13 years - not 15 years as set out in the NPPF. An extension of the plan period requires additional allocations for development but none are proposed.	As indicated, the revised plan period reflects the evidence. Para. 157 of the 2012 only states that 15 period time horizon is preferable . It is not mandatory. New site allocations have not been identified as being necessary during the examination process.	No change.
MMC463	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM1							We acknowledge the amended dates of 2014 to 2033, as recommended in the inspectors post-hearing advice.	Comments noted.	No change.
MMC172	Mr Greg Powell	Cheadle Unite			MM2							Consider that it is not reasonable to introduce an 'Implementation and Monitoring' process on the level of housing build if the objective is to continually leverage development at any cost such as accepting a lower rate of affordable housing / S106 commitments or allowing developments that do not meet the needs of the local community.	The Inspector's post hearing advice states that a housing OAN and requirement of 320 dwellings per annum (dpa) is justified and confirms that the overall requirement will still be 6080 dwellings. The implementation and monitoring section of the Local Plan sets out a framework for the policies indicating local plan objectives, monitoring indicators and	No change.

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													targets.	
MMC121	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM6	No	No	No	No	No	No	Changes should only be made to make sound a plan that is otherwise unsound. In respect of this policy, it is not clear why the plan is unsound with the policy as currently drafted.	Modification proposed at the request of the Inspector.	No change.
MMC160	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM6	No	No	No	No	No	No	Changes should only be made to make sound a plan that is otherwise unsound. In respect of this policy, it is not clear why the plan is unsound with the policy as currently drafted.	Modification proposed at the request of the Inspector.	No change.
MMC31	Mr John Wren		Mr John Wren	Director JMW Planning Limited	MM7	Yes	Yes	No	No	No	Yes	The other rural areas section now contains the phrase where development is normally unacceptable. This is factually incorrect as there are many aspects of countryside life which fall within the definition of development in the Act but are permitted by the GPDO.	The 'Other Rural Areas Strategy' Policy SS10 and the supporting text makes it clear that all development in these areas will be strictly controlled.	No change.
MMC30	Ms Hunter	Cheadle Town Council			MM8	No				No	No	<p>-The proposed housing level increase of 6000 dwellings for the Staffordshire Moorlands in the original Local Plan was already significantly higher than DCLG household projections of 2015. MM8 retains a very high figure of 6080 dwellings.</p> <p>-2016 ONS figures (Released late 2018) showed a further drop in the population growth projections for Staffordshire Moorlands. The level of housing proposed does not reflect the aspirations of the local community.</p> <p>-SMDC have presented the Planning Inspector with an 'Oxford Economics' model that significantly inflates the perceived level of housing need.</p> <p>MM21 details 1026 dwellings for Cheadle alone in less than 15 years. With an average occupancy of 2.4 residents this equates to a population increase of 2,462 residents against an existing population of 12,165 which is a 20% swell. This will bring minimal impact on the vitality of the town but maximum impact on the environment, traffic and infrastructure and is an unrealistic target.</p> <p>Most recent 2018 population projection figures also reflect a growth drop. ONS have consistently reduced population prediction figures since 2010 and none of this has been</p>	The Inspector's post hearing advice states that a housing OAN and requirement of 320 dwellings per annum (dpa) is justified and confirms that the overall requirement will still be 6080 dwellings.	No change.

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												reflected in the Local Plan.		
MMC29	Ms Hunter	Cheadle Town Council			MM8	No				No	No	There is no ongoing evidence that the Duty to Co-operate with Stoke on-Trent City Council is taking place. This needs to focus on regeneration of sustainable brownfield sites around road and rail networks; a co-ordinated transport policy to reduce air pollution, carbon footprint and address long term health concerns.	Responses should relate to the main modifications. Evidence regarding Duty to Co-operate (see section 9 Examination Library) has been provided to support the Local Plan.	No change.
MMC96	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	Mr Alan Corinal di-Knott	Knights 1759	MM8							<p>A number of changes are required to the housing trajectory:</p> <ul style="list-style-type: none"> - Removal of 175 dwellings at Barnfields, Leek which lapsed in August 2019. It is acknowledged that this is beyond the April 2019 base date. If retained in the supply, or push back commencement until 2022/23 (removing 30 dwellings from supply) - London Mill permission expired after the April 2019 basedate. Remove from trajectory or review commencement date in line with HIS assumptions (push back by 12 months - remove 30 dwellings from supply). - Cheadle Road Upper Tean permission for 67 dwellings has expired. Remove from trajectory or revise commencement in line with HIS (push back by 12 months - remove 22 dwellings from supply). <p>The above would result in a minimum of 82 dwellings being removed from the supply.</p> <p>Council's land supply position is not up to date. HIS position of 5.16 does not take account of the above or 10% lapse figure.</p> <p>Land supply position is actually 4.93 years.</p> <p>Local Plan should identify additional sites (e.g. BE041) as the plan will not provide a 5 year supply upon adoption and has a 400 shortfall against requirement over plan period.</p>	<p>The Inspector has asked for the five year housing land supply and the housing trajectory base date to be updated to the 31st March 2019. The sites in the trajectory reflect the planning permission status at this date and reflect the lead-in and build-out rates included in the HIS (see-Section 10). The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. Note that a RM application has been submitted for part of the Barnfields, Leek site (13/08/2019) which keeps the permission alive. Also note that the Cheadle Road, Upper Tean site was granted permission on 15/06/2016 (not expired) and had not expired at 31st March 2019. Whilst sites may have</p>	<p>If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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													<p>lapsed since this date, other sites have been granted planning permission since this date and have not been included in the trajectory.</p> <p>The slippage allowance has been applied to Policy SS4 and also reflected in the 5 year land supply calculation in the HIS. See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. New site allocations</p>	

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													have not been identified as being necessary during the examination process. The NPPF does not provide an absolute requirement to identify sites for the full plan period. New site allocations have not been identified as being necessary during the examination process.	
MMC98	Richard House	Gladman			MM8	Yes	No	Yes	No	No	Yes	Para. 7.22 should make it clear that the housing requirement is not a ceiling. Object to Liverpool method of calculating 5 year land supply as it conflicts with the Government's objective of significantly boosting housing supply. There is a wide range of deliverable sites to increase building rates.	The housing requirement is not a ceiling and would not be applied as such. The Liverpool method helps to ensure that the plan is aspirational but realistic . The trajectory as proposed will still significantly boost the supply of housing.	No change
MMC122	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM8	No	No	No	No	No	No	Object to reference to provides an adequate timeframe as it is not adequate in context of the NPPF. However, we recognise that a pragmatic judgement needs to be made in light of the Council's evidence base. Object to use of the Liverpool method. The Sedgfield method should be applied to address the housing shortfall. There are no sites with exceptional infrastructure requirements to limit development.	Para 157. of NPPF (2012) only states that a 15 year time horizon is preferable. It is not mandatory. The Liverpool method helps to ensure that the plan is aspirational but realistic . The trajectory as proposed will still significantly boost the supply of housing.	No change.
MMC161	Mr Martin		Mr Coxon	Emery Planning Partnership	MM8	No	No	No	No	No	No	Object to reference to provides an adequate timeframe as it is not adequate in context of the NPPF. However, we recognise that a pragmatic judgement needs to be made in	Para 157. of NPPF (2012) only states that a 15 year time horizon is	No change.

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	Webb											light of the Council's evidence base. Object to use of the Liverpool method. The Sedgefield method should be applied to address the housing shortfall. There are no sites with exceptional infrastructure requirements to limit development.	preferable. It is not mandatory. The Liverpool method helps to ensure that the plan is aspirational but realistic . The trajectory as proposed will still significantly boost the supply of housing.	
MMC173	Mr Greg Powell	Cheadle Unite			MM8							There is no ongoing evidence that the Duty to Co-operate with Stoke on-Trent City Council is taking place. This needs to focus on regeneration of sustainable brownfield sites around road and rail networks; a co-ordinated transport policy to reduce air pollution, carbon footprint and address long term health concerns.	Responses should relate to the main modifications. Evidence regarding Duty to Co-operate (see section 9 Examination Library) has been provided to support the Local Plan.	No change.
MMC167	Mr Greg Powell	Cheadle Unite			MM8							<p>-The proposed housing level increase of 6000 dwellings for the Staffordshire Moorlands in the original Local Plan was already significantly higher than DCLG household projections of 2015. MM8 retains a very high figure of 6080 dwellings.</p> <p>-2016 ONS figures (Released late 2018) showed a further drop in the population growth projections for Staffordshire Moorlands. The level of housing proposed does not reflect the aspirations of the local community.</p> <p>-SMDC have presented the Planning Inspector with an 'Oxford Economics' model that significantly inflates the perceived level of housing need.</p>	The Inspector's post hearing advice states that a housing OAN and requirement of 320 dwellings per annum (dpa) is justified and confirms that the overall requirement will still be 6080 dwellings.	No change.
MMC189	St Modwen Homes	St Modwen Developments Limited	Mr Peter Hayward	Director Turley	MM8							The Main Modifications highlight a high shortfall in past housing completions in the District (788 homes at March 2019), hence a 20% buffer is applied along with the 'Liverpool method' to reflect this persistent under delivery and spread the housing shortfall to the year 2033 (MM8). This goes on to state that the overall 6,080 dwelling requirement over the revised Plan period of 2014-2033 should not be viewed as an absolute maximum (Policy SS3: Future Provision and Distribution of Development).	Support noted.	No change.

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												St Modwen Homes are committed to delivering dwellings at Blythe Vale early on in the Plan period (by 2024/2025), as confirmed through the Housing Implementation Strategy consultation of February 2019. This would make a significant contribution towards addressing both the shortfall to date and the identified need for the Plan period, and it is important that the policy framework set in the Plan provides an appropriate framework to support this delivery.		
MMC219	Miss Jane Field	Planning Specialist Environment Agency			MM8							We have no objections to the SA undertaken for both the Main Modifications and the Biddulph site options, submitted in support of this consultation.	Support noted.	No change.
MMC222	Seabridge Developments Limited		Mr Andy Williams (Advance Land & Planning)		MM8 p.49 para 7.28							We strongly support the assertion that exceptional circumstances exist for the release of Green Belt.	Support noted.	No change.
MMC224	Seabridge Developments Limited		Mr Andy Williams (Advance Land & Planning)		MM8 p.50 Policy SS3		No	No	No			The policy should state more explicitly what approach will be adopted in the event that the Council is unable to demonstrate a minimum 5 year housing supply. For instance, will it commit to an early partial review of the Plan to identify additional housing land allocations that can be delivered without delay? Alternatively, will support applications on safeguarded land to enable early delivery to assist the supply position?	Policy SS4 sets out how the release of land for housing and employment across the District will be managed in order to deliver the level and distribution of development required in the Plan and states that 'if necessary the Council will review the Local Plan to bring forward additional sites for development'.	No change.
MMC24	Mr Sean McBride	Persimmon Homes North West			MM9		No			No		Support MM9 which seeks to include a slippage allowance which is factored into the housing trajectory. It's considered unlikely that all the sites will be built at the rates envisaged and Persimmon considers that together with the Council's persistent failure to achieve its	The 10% slippage allowance is based upon an analysis of historic lapse rates in the District and the Inspector's post	If the Inspector considers it appropriate, revise the HIS and the 5 year

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												<p>housing requirement, a slippage rate in excess of 10% is justified.</p> <p>In addition the Housing Trajectory contained within the Housing Implementation Strategy (HIS) demonstrates that there will not be sufficient housing completions in the district to meet the housing requirement - showing a 271 homes under supply. The projected completions already factor in a windfall allowance on both small and large sites throughout the plan period but fails to incorporate the 10% slippage allowance to the housing requirement or commitments referred to in MM9.</p> <p>The HIS states that existing housing commitments from unimplemented approvals will contribute significantly towards housing delivery and includes a list of sites with consent however, this again does not account for the 10% lapse rate defined within MM9. On this basis it is considered that the Local Plan is not positively prepared nor consistent with national policy, insofar as it does not 'seek to meet objectively assessed development requirements'.</p>	<p>hearing advice stated that an allowance of 10% should be applied. The slippage allowance has been applied to Policy SS4 and also reflected in the 5 year land supply calculation in the HIS. See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. The NPPF does not provide an absolute requirement to identify sites for the full plan period.</p>	<p>land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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MMC36	Mr T A J Campbell		Mr John Wren	Director JMW Planning Limited	MM9	Yes	Yes	Yes	Yes	Yes	Yes	The increase to 1197 in respect of housing supply in Cheadle (Policy SS4) is welcomed and reflects the need to address long standing under investment in one of the District's three largest towns.	Support noted.	No change.
MMC100	Richard House	Gladman			MM9	Yes	No	No	No	No	Yes	Expected housing provision of 3419 is below the requirement of 3802. The plan is therefore not effective. Additional sites that are capable of coming forward during the plan period should be allocated.	Site allocations are not mandatory for the period 11-15 years. New site allocations have not been identified as being necessary during the examination process.	No change.
MMC124	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM9	No	No	No	No	No	No	10% slippage allowance is not sufficient given the failure to meet development requirements since the adoption of the Core Strategy. An allowance of at least 20% is required. There are no additional allocations or locations for an increase in units over the previous plan. The trajectory indicates a deficit of -271 dwellings, when, due to the 10% slippage allowance, the overall provision should be a surplus of 608. Additional sites should be identified. The NPPF requirement to identify sites in years 11-15 where possible has been misinterpreted. In this case, it is eminently possible to identify more sites for the plan period. Local Plan does not take requirement for permanence of Green Belt beyond the plan period into consideration. Strategy for Rural Areas needs to be fundamentally adjusted with sufficient housing to meet needs. Table 7.8 show the employment land requirement for Leek as 7.12ha but only 6.39ha is allocated. An additional site for c. 0.5ha is required.	The 10% slippage allowance is based upon an analysis of historic lapse rates in the District. See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.

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													5.19 years. The NPPF does not provide an absolute requirement to identify sites for the full plan period. Safeguarded land is identified in Biddulph as part of the main modifications. The Rural Areas Spatial Strategy is not subject to modification.	
MMC162	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM9	No	No	No	No	No	No	10% slippage allowance is not sufficient given the failure to meet development requirements since the adoption of the Core Strategy. An allowance of at least 20% is required. There are no additional allocations or locations for an increase in units over the previous plan. The trajectory indicates a deficit of -271 dwellings, when, due to the 10% slippage allowance, the overall provision should be a surplus of 608. Additional sites should be identified. The NPPF requirement to identify sites in years 11-15 where possible has been misinterpreted. In this case, it is eminently possible to identify more sites for the plan period. Local Plan does not take requirement for permanence of Green Belt beyond the plan period into consideration. Strategy for Rural Areas needs to be fundamentally adjusted with sufficient housing to meet needs.	The 10% slippage allowance is based upon an analysis of historic lapse rates in the District. See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The NPPF does not provide an absolute	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply

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													requirement to identify sites for the full plan period. Safeguarded land is identified in Biddulph as part of the main modifications. The Rural Areas Spatial Strategy is not subject to modification.	
MMC228	Seabridge Developments Limited		Mr Andy Williams (Advance Land & Planning)		MM9 p.52 Table 7.2							We note the revised net housing requirement for Biddulph of 962 dwellings	Comment noted.	No change.
MMC227	Seabridge Developments Limited		Mr Andy Williams (Advance Land & Planning)		MM9 p.54 Policy SS4		No	No	No			We note the revised net housing requirement for Biddulph of 962 dwellings. It is also noted that Table 7.7 only identifies potential provision 734 dwellings (which is reduced from 890 units), including allocations totalling 604 dwellings (which is reduced from 730 units). This results in a deficit of 228 dwellings against the net requirement for the plan period, which is an inadequate and avoidable response to the housing shortfall in Biddulph. We suggest that the allocations should be increased by the identification of the sites at Gillow Heath – BD062 (35 units), BD068 (70 units) and BD087 (15 units), which according to the Council's Assessment of Possible Site Allocations, together have an estimated capacity of 120 units.	The NPPF does not provide an absolute requirement to identify sites for the full plan period. New site allocations have not been identified as being necessary during the examination process.	No change.
MMC5	Messrs Hilton and Sanderson				MM12							Object to inclusion of BD087 for the following reasons: <ul style="list-style-type: none"> - Land is Green Belt; - The area is a flood plain; - There will be a lack of privacy to any new homes as they would be overlooked by existing homes on Congleton Road; - Inadequate highway infrastructure / traffic 	This land is proposed for safeguarding. As explained in the proposed new paragraph (main modification 12 on the schedule of main modifications) national planning policy makes it clear that	Refer to MMC256.

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												<p>congestion issues - need road widening, footpaths, street lighting etc.- concerned about who would pay for these improvements;</p> <ul style="list-style-type: none"> - Query why sites previously excluded are now in the plan; - There are far more suitable potential development areas around Biddulph; - Our property has no mains drainage - access is needed to maintain pipework; - Pollution from waste water treatment works; - Negative impact on beauty and ecology; - No local consultation on this issue; and - Site could not support affordable housing. 	<p>safeguarding land is not the same as allocating land. The intention is that it is set aside to meet future needs (rather than needs within the plan period like an allocation). Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development so there is no guarantee that it will become an allocation. The land may not be needed in certain circumstances, for example - if the housing requirement for the District and / or spatial strategy changes in the future - but it provides a buffer to ensure that Green Belt boundaries around Biddulph have a degree of permanence.</p> <p>Main modifications to Policy SS6 clearly state that the land is not intended for development within the plan period (i.e. up to 2033):</p> <p>"Include areas of 'safeguarded land' at Gillow Heath (BD062, BD068 & BD087) between</p>	

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													<p>the urban area and the Green Belt, in order to meet Biddulph's longer-term development needs. This land is not allocated for development at the present time. Planning permission for the permanent development of this land will only be granted following a Local Plan review which proposes the development".</p> <p>Exceptional circumstances for land released from the Green Belt for safeguarding must be demonstrated. The general approach to safeguarding was selected on the basis that:</p> <ul style="list-style-type: none"> • Additional housing allocations are not considered to be essential at this stage given that the Council can demonstrate it has sufficient housing supply to provide for 5 years (5.16) and 10 years without replacing site BDNEW with <p>additional sites in the Green Belt. Indeed, housing supply (for 10 years and</p> <p>plan period) can be boosted without any further Green Belt</p>	

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													<p>release by maximising capacity on existing allocations. As such, exceptional circumstances do not exist for additional allocations.</p> <ul style="list-style-type: none"> On balance, the principle of the identification of safeguarded land in Biddulph is deemed appropriate in order to provide potential opportunities for <p>development in a future Local Plan review. Biddulph is one of three towns in</p> <p>the District but is the only one which is surrounded entirely by Green Belt. It is</p> <p>likely that some land outside the current town boundary will be necessary in</p> <p>order to support housing growth and the sustainability of Biddulph in the long term.</p> <ul style="list-style-type: none"> It is supported by the Sustainability Appraisal. <p>Land at Gillow Heath (BD062, BD068 and BD087) is the preferred location for</p>	

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													<p>safeguarding as it:</p> <ul style="list-style-type: none"> • Is less harmful to Green Belt purposes when compared with the alternatives. • Suffers from fewer wider planning constraints (e.g. agricultural land classification and access). United Utilities have removed their objection to the site as they cannot demonstrate that the land will be needed for their purposes in the future. However, their preference would still be for other locations. • The land is being actively promoted for development and is therefore likely to deliverable when required. <p>Ecological evidence has been gathered for the areas proposed for safeguarding. (Documents 14.1 and 14.8 in the Examination Library). However, as these sites are not proposed for development during this plan period,</p>	

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													<p>more ecological and other supporting evidence would be needed at any such time that they were considered for a possible housing allocation. If necessary, Policy SS6 could be modified to clarify the fact that further detailed consideration of planning matters, including ecology, would be required to inform a future Local Plan review.</p> <p>These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323). Land not considered to be suitable for release from the Green Belt in the Council's Green Belt Review (Document 22.4 and appendices) was not considered for safeguarding. The site boundaries have been drawn to exclude land in the flood plain.</p>	

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MMC13	Mr Barrington Webb				MM12							<p>(Summary of two emails) Surprised to see these three sites have been included despite them previously being rejected. They are most unsuitable due to:</p> <ul style="list-style-type: none"> - two of the sites have been refused planning permission before; - being on the boundary of the sewage works; - the outdated sewerage system. There have been flooding incidents after heavy rain when the sewers have been unable to cope resulting in raw sewage overflowing directly into Biddulph Brook and nearby properties and the lifting of inspection chambers. More housing combined with climate change are likely to make this situation even worse; - unable to find any comments from the Environment Agency or from United Utilities regarding the suitability of these sites; - very poor highway access and extra traffic on Marsh Green Road and/or Mow Lane. Local police consider these are the most dangerous roads in Biddulph. - traffic count data provided by Staffordshire County Council (2015) is provided. This has obviously increased over the last four years in part due to the new homes on the Uplands Mill estate. - this is a single lane with a narrow stone bridge and there are no pavements and street lighting. In addition tankers enter/leave the sewage works site at least once a day. The route leads to one of the access points to the Biddulph Valley Way which is extensively used. Concerned that the two sites would create an increased level of danger, not only for current residents but for new residents on the safeguarded sites too. 	<p>National planning policy requires the Council to have regard to the intended permanence of Green Belt boundaries in the long term, so that they are capable of enduring beyond the plan period. With this in mind, the Council has identified a cluster of three sites at Gillow Heath for safeguarding to meet development needs beyond the plan period. This has been necessary in Biddulph as it is surrounded by Green Belt which constrain the town's future development options.</p> <p>Biddulph Options Planning Analysis evidence published as part of the consultation material provides details on the site selection process. Land not considered to be suitable for release from the Green Belt in the Council's Green Belt Review (Document 22.4 and appendices) was not considered for safeguarding.</p> <p>These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of</p>	MMC256.

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													noise, odour, highways / access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323). The site boundaries have been drawn to exclude land in the flood plain.	
MMC17	Mr John James				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC19	Mr John James				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC23	Mr David Sanderson				MM12							'Biddulph Modified Local Plan - Missing Information' Deep concern about information not reported by the planning team to the Council meeting in June 2019. The modifications have been put forward with information that is several years out of date and it's clear that all the other sites in the Biddulph area were not considered before BD062, BD068 and BD087 were reintroduced. - 4 years ago the Environment Agency told the LPA that all other potential development sites should be considered before looking at the above 3 sites. These sites were originally excluded at an earlier stage. - Biddulph Town Council voted to exclude these 3 sites from the Local Plan. - A Council Green Belt report stated that the sites should only be considered under	Refer to MMC179.	Refer to MMC256.

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												<p>'exceptional circumstances' so why has this been ignored?</p> <p>- The planning team have only earmarked 12 sites from the previous options document where there were originally 27 possible sites. Back then BD062, BD068 and BD087 were excluded.</p> <p>-These sites were reintroduced after BDNEW was taken out of the Local Plan because it was Green Belt land. All these 3 sites are Green Belt land.</p> <p>- Consider all 3 sites should be rejected and returned to SMDC for further consideration.</p>		
MMC9	Mr Jim Davies				MM12			No				<p>Object to MM12 - Inclusion of 'safeguarded' sites BD 062, BD 068 and BD 087. These sites are an unsound inclusion for the following reasons: United Utilities requested using other sites in preference, also noise and smell particularly in the summer (verified by residents living near sewage plant). Poor access via Marsh Green Road and difficult uphill egress onto A527. Documented flood risk on BD 087 and to access. Sensitive strategic wildlife area and wildlife corridor with diverse flora, clearly documented in the Biddulph Neighbourhood Plan documentation. Not a sustainable site regarding access to town centre. The removed BDNEW is in a sustainable location and has potentially good access and non of the other problems of the replacement sites. This should be reinstated as a 'safeguarded' site. It has been noted that this site could be brought forward in the future by Amec Foster Wheeler in their 'Recommendations for Green Belt release and Settlement Boundary Adjustment'. The inspector noted in his report that his advice could change on the receipt of suitable evidence. Confirmation of the flood risk on BD 087 and the documentation in the Biddulph Neighbourhood Plan provides this evidence.</p>	<p>These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323). Land not considered to be suitable for release from the Green Belt in the Council's Green Belt Review (Document 22.4 and appendices) was not considered for safeguarding. The boundary of BD087 has been drawn to exclude land in the flood plain. United Utilities have not formally objected to the safeguarding of</p>	<p>To further emphasise that ecology, flooding and other relevant issues will be considered as part of any site allocation, it is suggested that if the Inspector considers it appropriate, an amendment to Policy SS6 could be made. For example, addition of wording such as "Any future development of the sites would require consideration of matters such as ecological surveys, layout, residential amenity and flood plain boundaries".</p>

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													<p>these sites. Ecological evidence has been gathered for the areas proposed for safeguarding. (Documents 14.1 and 14.8 in the Examination Library). However, as these sites are not proposed for development during this plan period, more ecological and other supporting evidence would be needed at any such time that they were considered for a possible housing allocation.</p> <p>The Inspector's Post Hearing Advice (document EL6.004) recommends removal of BDNEW from the Local Plan. On the basis of the Inspector's recommendations, the Council agreed main modifications to delete BDNEW at the Council Assembly meeting on the 26th June 2019.</p>	
MMC10	Mrs Beverley Webb				MM12							<p>Strongly object to the inclusion of these three sites as they are still considered to be unsuitable:</p> <ul style="list-style-type: none"> - BD062 and BD068 are still on the boundary of the sewage treatment plant. - All three sites are on a flood plain and after heavy rain flooding is a problem. - Issue with raw sewage at the south of the sewage plant. A previous meeting with United Utilities engineer made it clear that the pipes 	Refer to MMC179.	Refer to MMC256.

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												<p>are very old and to replace the main sewer from the High Street in Biddulph for larger capacity would be impossible.</p> <p>- Sites have been hurriedly included without any thought as to why they were previously rejected.</p> <p>- Concerned that once these have been removed from the greenbelt they can never be returned.</p> <p>Biddulph Options document considers 5 options. Options 1 to 4 mention other sites in and around Biddulph/Knypersley including the three sites for safeguarding however the 5th option omits them all apart from BD062, BD068 & BD087 which are the worst three sites. Why is this? They suffer from flooding, access is poor and nearby junctions are dangerous.</p>		
MMC16	Mrs Ann James				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC18	Mr John James				MM12	No	No	No	No	No	No	<p>Out of date information used to develop the Modified Plan</p> <p>SMDC Planning stated at 26 June meeting that they used findings from 2014/2015/2016 to justify their development/conclusion to support the Modified Local Plan. This excluded information from 2017/2018/2019.</p> <p>SMDC Planning was requested in 2015 to develop Level 2 SFRA flood risk analysis for BD087, in checking with the EA this has not been completed. There is only SFRA Level 1 on record.</p> <p>In 26/08/15 EA letter to SMDC clearly states that all other sites should be considered before this site. Sites BD062/BD068/BD087 were originally excluded during 2016 consultation. Modified Local Plan only identifies 12 sites from the original housing plan in 2014; originally 27 sites identified. BD062/BD068/BD087 were considered but excluded.</p> <p>1. BD062/BD068/BD087 were reintroduced</p>	<p>The site boundaries have been drawn to exclude land in the flood plain. National planning policy requires the Council to have regard to the intended permanence of Green Belt boundaries in the long term, so that they are capable of enduring beyond the plan period. With this in mind, the Council has identified a cluster of three sites at Gillow Heath for safeguarding to meet development needs beyond the plan period. This has been necessary in Biddulph as it is</p>	Refer to MMC256.

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												<p>May 2019 after Inspector rejected Plan - point out that BDNEW was to be removed from Plan as it was green belt. BD062/BD068/BD087 are all green belt.</p> <p>2. 2015 Green Belt report stated all 3x BD062/BD068/BD087 should only be considered under exceptional circumstances. But [recommendation for] BDNEW that should be considered for future development. Question why GB report not been used as factual base for development of Biddulph.</p> <p>3. Biddulph Town Council had rejected all three sites from the Local Plan in 2015. The Biddulph Neighbourhood Plan 24/09/19 (most up to date and prepared with due diligence and public participation) - identifies all 3 sites as nature corridor and natural green space.</p> <p>SMD Executive Director clearly stated on 26/06 that modified SMDC Local Plan is supported by information 3-5 years old. Clear that SMDC not carried out all processes necessary to ensure that BD062/BD068/BD087 can be safely safeguarded for future building needs. Also clear that all other Staffs Moorlands/Biddulph area sites were not considered. Believe that without full process control in developing modified Plan, Plan should be sent back to SMDC for reconsideration. This will allow time for local input.</p>	<p>surrounded by Green Belt which constrain the town's future development options. Exceptional circumstances for land released from the Green Belt for safeguarding must be demonstrated. The general approach to safeguarding was selected on the basis that:</p> <ul style="list-style-type: none"> • Additional housing allocations are not considered to be essential at this stage given that the Council can demonstrate it has sufficient housing supply to provide for 5 years (5.16) and 10 years without replacing site BDNEW with additional sites in the Green Belt. Indeed, housing supply (for 10 years and plan period) can be boosted without any further Green Belt release by maximising capacity on existing allocations. As such, exceptional circumstances do not exist for additional allocations. • On balance, the principle of the identification of safeguarded land in 	

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													<p>Biddulph is deemed appropriate in order to provide potential opportunities for development in a future Local Plan review. Biddulph is one of three towns in the District but is the only one which is surrounded entirely by Green Belt. It is likely that some land outside the current town boundary will be necessary in order to support housing growth and the sustainability of Biddulph in the long term.</p> <ul style="list-style-type: none"> • It is supported by the Sustainability Appraisal. <p>Land at Gillow Heath (BD062, BD068 and BD087) is the preferred location for safeguarding as it:</p> <ul style="list-style-type: none"> • Is less harmful to Green Belt purposes when compared with the alternatives • Suffers from fewer wider planning constraints (e.g. agricultural land classification and 	

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													<p>access). United Utilities have removed their objection</p> <p>to the site as they cannot demonstrate that the land will be needed for</p> <p>their purposes in the future. However, their preference would still be for</p> <p>other locations.</p> <ul style="list-style-type: none"> • The land is being actively promoted for development and is therefore likely to deliverable when required. <p>Biddulph Options Planning Analysis evidence published as part of the consultation material provides details on the site selection process. Land not considered to be suitable for release from the Green Belt in the Council's Green Belt Review (Document 22.4 and appendices) was not considered for safeguarding.</p>	
MMC20	Mr John James				MM12	No	No	No	No	No	No	<p>No Buy in by the people of Biddulph</p> <p>Shortcutting of the Modification selection process is not acceptable.</p> <p>Question why these sites have been deemed Level 1 Building land given they were all excluded in 2016 as unsuitable. These sites are on flood plain and have soil issues - any</p>	<p>National planning policy requires the Council to have regard to the intended permanence of Green Belt boundaries in the long term, so that</p>	Refer to MMC256.

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												<p>housing/infrastructure on site would not be capable of being insured. Therefore no mortgage availability. Question who would be responsible for public liability insurance.</p> <p>Object to very late modification to SMDC Local Plan. Addition of safeguarded land without proper investigation especially into public safety issues and clear lack of public consultation could lead to legal action - expensive to Council.</p> <p>SMDC Planning identified 12 out of the original 27 Biddulph sites in 2015 and ranked BD087/BD068/BD062 as 1, prime building land - no other site in Biddulph ranked 1. 16x of the original 2015 Local Plan Biddulph sites were not even considered.</p> <p>At the meeting on 26/06/19 the Executive Director was asked 3 times why this land was ranked 1 given 2x of the sites have flooding issues; and why no other sites ranked 1 - no answer given.</p> <p>Failure to consider other sites together with lack of or no consultation since 26/06/19 - why these sites.</p> <p>Do not believe due process has been followed - questions Council motives. Asks Council to confirm all due diligence has occurred up front (not later on). Could prove to be expensive waste of time.</p>	<p>they are capable of enduring beyond the plan period. With this in mind, the Council has identified a cluster of three sites at Gillow Heath for safeguarding to meet development needs beyond the plan period. This has been necessary in Biddulph as it is surrounded by Green Belt which constrain the town's future development options. Biddulph Options Planning Analysis evidence published as part of the consultation material provides details on the site selection process. Land at Gillow Heath (BD062, BD068 and BD087) is the preferred location for safeguarding as it:</p> <ul style="list-style-type: none"> • Is less harmful to Green Belt purposes when compared with the alternatives • Suffers from fewer wider planning constraints (e.g. agricultural land classification and access). United Utilities have removed their objection to the site as they cannot demonstrate that the land will be 	

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													<p>needed for their purposes in the future. However, their preference would still be for other locations.</p> <ul style="list-style-type: none"> • The land is being actively promoted for development and is therefore likely to deliverable when required. <p>These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323). Land not considered to be suitable for release from the Green Belt in the Council's Green Belt Review (Document 22.4 and appendices) was not considered for safeguarding. The site boundaries have been drawn to exclude land in the flood plain. The process followed is in line with legislation.</p>	

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MMC41	Mr David Sanderson				MM12							Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC43	Mr David Sanderson				MM12							<p>'SMDC Motives'</p> <p>Object to inclusion of BD062, BD068 and BD087 as safeguarded land. Query speed plan is moving at and SMDC motives. Inadequate preparations have been made. Modifications have come late in the day. Is this to thwart opposition? What about public safety issues (refer to other representations made). Object to lack of public consultation which could lead to legal action against the Council. Previous sites from 2015 plan (16no) were not considered. Sites are on a floodplain. Have full site investigations and consultation taken place? Suggest the proper process has not been followed. Why has the modified plan been so hurried. Hardly anyone was informed of the consultation. Site owners have been kept up to date with ongoing developments. Inclusion of the sites would be detrimental to Biddulph and its residents.</p>	<p>The timetable for the examination process is set by the Inspector and it is normal for Main Modifications to come at this time. The 6 week consultation period is in line with legislation as is the process followed. These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, highways / access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323). Biddulph Options Planning Analysis evidence published as part of the consultation material provides details on the site selection process. Land not considered to be suitable for release from the Green Belt in the Council's Green Belt Review (Document 22.4 and appendices)</p>	No change.

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													was not considered for safeguarding. The site boundaries have been drawn to exclude land in the flood plain. The Council sent emails or postcards out to all individuals and organisations who have previously commented on the Local Plan or asked to be kept informed to let them know about the consultation. This amounted to over 10,000 addresses.	
MMC45	Mr M Hilton				MM12							Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC47	Mr M Hilton				MM12							Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC40	Mr David Sanderson				MM12							'General Objections' Object to housing development on BD062, BD068 and BD087. United Utilities and the Environment Agency requested that all other options plus 27 other potential sites should be looked at before looking at BD062, 68 and 87. Environment Agency and the Government has stated in the past that sites with a high flood risk should not be developed. These sites are flood risk areas (have photographic evidence). Also ensure that new development reduces flood risk to other areas of land. A site inspection and detailed report is needed. Query why these sites have been reintroduced when there are other more suitable sites. Under no circumstances should these sites be included.	Refer to MMC179.	Refer to MMC256.
MMC42	Mr David				MM12							Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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	Sanderson													
MMC44	Mr M Hilton				MM12							<p>'Biddulph Modified Local Plan - Missing Information'</p> <p>Deep concern about information not reported by the planning team to the Council meeting in June 2019. The modifications have been put forward with information that is several years out of date and it's clear that all the other sites in the Biddulph area were not considered before BD062, BD068 and BD087 were reintroduced.</p> <p>- 4 years ago the Environment Agency told the LPA that all other potential development sites should be considered before looking at the above 3 sites. These sites were originally excluded at an earlier stage.</p> <p>- Biddulph Town Council voted to exclude these 3 sites from the Local Plan.</p> <p>- A Council Green Belt report stated that the sites should only be considered under 'exceptional circumstances' so why has this been ignored?</p> <p>- The planning team have only earmarked 12 sites from the previous options document where there were originally 27 possible sites. Back then BD062, BD068 and BD087 were excluded.</p> <p>- These sites were reintroduced after BDNEW was taken out of the Local Plan because it was Green Belt land. All these 3 sites are Green Belt land.</p> <p>- Consider all 3 sites should be rejected and returned to SMDC for further consideration.</p>	Refer to MMC179.	Refer to MMC256.
MMC46	Mr M Hilton				MM12							Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC48	Mr M Hilton				MM12							<p>'SMDC Motives'</p> <p>Object to inclusion of BD062, BD068 and BD087 as safeguarded land. Query speed plan is moving at and SMDC motives. Inadequate preparations have been made. Modifications have come late in the day. Is this</p>	The timetable for the examination process is set by the Inspector and it is normal for Main Modifications to come at this time.	No change.

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												<p>to thwart opposition? What about public safety issues (refer to other representations made). Object to lack of public consultation which could lead to legal action against the Council. Previous sites from 2015 plan (16no) were not considered. Sites are on a floodplain. Have full site investigations and consultation taken place? Suggest the proper process has not been followed. Why has the modified plan been so hurried. Hardly anyone was informed of the consultation. Site owners have been kept up to date with ongoing developments. Inclusion of the sites would be detrimental to Biddulph and its residents.</p>	<p>The 6 week consultation period is in line with legislation as is the process followed. These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, highways / access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323). Biddulph Options Planning Analysis evidence published as part of the consultation material provides details on the site selection process. Land not considered to be suitable for release from the Green Belt in the Council's Green Belt Review (Document 22.4 and appendices) was not considered for safeguarding. The site boundaries have been drawn to exclude land in the flood plain. The Council sent emails or postcards out to all individuals and organisations who have previously commented on the Local Plan or asked</p>	

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													to be kept informed to let them know about the consultation. This amounted to over 10,000 addresses.	
MMC53	Mr Pete Turner				MM12	No	No	No	No	No	No	See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC61	Mr Graeme Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC63	Mrs Janet Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC65	Mrs Janet Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC67	Mrs Janet Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC72	Mr Gary Smith				MM12							Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC74	Mrs Kath Simmonds				MM12	No	No	No	No	No	No	Object to loss of Green Belt due to: 1. All Brownfield sites should be exhausted before any Green Belt land is considered to fulfil future development needs. 2. Two of the three sites at Gillow Heath (BD 068 & 087) are on a recognised flood plain with a natural watercourse bordering them which is susceptible to flooding as was demonstrated during the recent heavy rainfall of 25th & 26th October. With climate change this can only worsen and would be	Proportional evidence has been gathered for each site. In contrast to site allocations which need to be delivered within the plan period, a more long-term view of constraints for safeguarded land can be taken. Also, the same level of	Refer to MMC256.

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												<p>exacerbated by the development of this land causing future problems for both new & existing property owners. I understand that some property owners in the area are already unable to insure their properties against flood risk.</p> <p>3. The existing infrastructure is inadequate for increased use with only a single road access which in places is single track.</p> <p>4. The proposed sites sit outside the Biddulph Town Boundary and as such do not have the services needed to support low cost housing and housing for an ageing population, without substantial further investment.</p>	<p>detailed information as would be needed for an allocation is not necessarily required when land is safeguarded as the position would be reviewed in the next plan and would include assessment of up to date evidence at that time before an allocation was made.</p> <p>In their response to this consultation, the Environment Agency say that if the sites come forward for development at a later stage they would require a Level 2 Strategic Flood Risk Assessment because they are within close proximity of the floodplain and this may affect capacity and layout. However, they state that this would not be required for the land to be safeguarded.</p>	
MMC58	Mr Graeme Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC60	Mr Graeme Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC62	Mr Graeme				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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	Court													
MMC64	Mrs Janet Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC66	Mrs Janet Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC73	Mrs Dianne Copeland				MM12			No	No		No	<p>- Parts of the evidence were missed out when decisions on the main modifications were taken.</p> <p>- Safeguarding here will not work well -there is a sewage works on this site which doesn't work properly. There is a lot of wildlife on this land which we all look after, it's a little piece of paradise for our wild friends.</p> <p>- There is a failing in duty to have regard to biodiversity.</p>	See standard officer response in MMC256.	See MMC256.
MMC76	Mr Trevor Simmonds				MM12	No	No	No	No	No	No	<p>With reference to the paragraph inserted between 7.50 & 7.51 I wish to make the following comments:</p> <ol style="list-style-type: none"> All Brownfield sites should be exhausted before consideration is given to the use of Green Belt land Sites BD 068 & 087 are on a known flood plain, susceptible to flooding as was witnessed during the weekend of 25th & 26th October 2019. The sites have been previously assessed and dismissed as unsuitable for development and therefore why has the suitability level been changed from Level 2/3 to Level 1 with no change to the sites having been made? The current infrastructure cannot sustain any increased usage. The stated housing strategy is for increased provision of low cost housing and housing for an ageing population. The location of these sites outside the Town Council boundary would not be suitable for the required housing due to lack of services in the vicinity.. 	None of the site boundaries are within Flood Zones 2 or 3. In their response to this consultation, the Environment Agency say that if the sites come forward for development at a later stage they would require a Level 2 Strategic Flood Risk Assessment because they are within close proximity of the floodplain and this may affect capacity and layout. However, they state that this would not be required for the land to be safeguarded.	Refer to MMC256.

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MMC78	Mr G Cooper				MM12	Yes	Yes	Yes	Yes	Yes	Yes	Considers the plan is sound, legally compliant and complies with the duty to co-operate.	Support noted.	No change.
MMC59	Mr Graeme Court				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC79	mr Stephen Willott				MM12			No	No	No	No	See standard summary in MMC256.	Refer to standard officer response to MMC256.	See MMC256.
MMC4	Mrs V Woodward				MM12							<p>Object to inclusion of BD087 for the following reasons:</p> <ul style="list-style-type: none"> - The area is a flood plain; - There will be a lack of privacy to any new homes as the adjacent homes on Congleton Road are around 10 metres higher than this land; - Four houses on Congleton Road with no mains drainage have right of way across this land for their pipework which drains into the brook; - Inadequate site access - Marsh Green Road is narrow with no footpaths or lighting and the bridge across the brook is inadequate to take the weight of large vehicles - concerned about whether the taxpayer would pay for these improvements; - None of the houses will be affordable; - Will destroy an area of beauty; and - Negative impact on ecology. 	Refer to MMC179.	Refer to MMC256.
MMC94	Mrs G Price				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC81	M Canigli				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256..

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MMC113	Mr Ian Brown				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC83	Mr and Mrs I Condliffe				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC112	Ms Julia Perry				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC118	Ms Naomi Waters				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC131	Mr Robert Sherwin				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC141	Mrs Rita Bradley				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC143	Mr Lee Tabbinor				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC125	Mr Jonathan Greatbatch				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC145	Mr and Mrs G Bowyer				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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MMC89	Mrs S Canigli				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC149	Mr and Mrs Vickers				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to MMC256.
MMC155	Mr Barrington Webb				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC157	Mrs Beverley Webb				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC146	Miss Madelaine Gresham				MM12							Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC136	Mrs Margaret Nelson				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC138	Mr & Mrs S & C Fielding				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC152	Mr Paul Thomas				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC163	Mr Anthony Chadwick				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC151	Mr Barry				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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	Knapper													
MMC171	Mrs Edith Martin				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC147	Mr and Mrs A and A Potts				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC168	Mr Arthur Potts				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC179	Mr Gary Smith				MM12	No	No	No	No	No	No	<p>Lack of due process control</p> <p>On 26/06/19 SMDC Council voted to amend the SMDC Local Plan to include three sites surrounding the Biddulph Water Treatment Works [BD062, BD068, BD087]. The Planning officer [present] stated United Utilities had no objections..no mention was made of environmental effects or concerns raised by Environment Agency.</p> <p>Past information supplied to SMDC - the EA [stated that when selecting allocation sites the Council need to demonstrate how they have steered development away from highest flood risk land and where possible reduce flood risk elsewhere..].</p> <p>In 2015 the EA and UU requested that SMDC consider all other options, 27 sites before [BD062, BD068, BD087]. The EA then stated development that increases flood risk to neighbouring land..will not be permitted.</p> <p>1. A Level 2 SFRA would be necessary to support BD068 & BD087 being taken forward as Preferred Options [to ensure both sites are capable of supporting housing]. SMDC identified this need in March 2016.</p> <p>2. Extensive modification to the brook will be required. Video of flash flooding is available [most recently 28/07/19] - SMDC did not</p>	These sites were included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, access, flood risk and ecology etc.were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323). Biddulph Options Planning Analysis evidence published as part of the consultation material provides details on the site selection process. Land not considered to be suitable for release from the Green Belt in the Council's	Refer to MMC256.

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												<p>request this information. Failure [to do this] renders final decision on modified Plan futile. Recommend EA is requested to carry out a site inspection to [cover] their concerns eg Site Evacuation Plans. Question what is point of safeguarding land if no building to be allowed..eg [previous BD087 refusals]. BD087 in floodplain - the access road/bridge may be built on FZ2/3. BD068 access road may be built FZ2. In past no account has been taken of surface water issues.</p> <p>The Government has stated flood plains should be avoided where other sites are available. Flood prevention in Congleton area must be a priority [these sites will add to problem].</p> <p>In 01/07/19 SMDC letter to Inspector - Planning identified 12 out of the original 27 Biddulph sites in Local Plan and ranked [BD062, BD068, BD087] as 1 prime building land - no other site in Biddulph is ranked 1. 16 of the original 2015 Local Plan sites were not considered.</p> <p>Health Concerns</p> <p>In 27/05/16 letter United Utilities stated [that UU position is...it would more appropriate to identify new housing sites that are not close to water treatment works].</p> <p>Issues:</p> <p>1. Smell and odour - site owner submitted survey states this is not problem. [But] since 1979 there have been numerous complaints about smell/odour/leakage of sewage from BWTW into brook. Even UU concede odour issue.</p> <p>2. BD062 &BD068 within 10m of water treatment boundary...change in climate conditions [hotter in summer and winter] could be increase in insect numbers. Question potential for infectious diseases. Believe UU and EA need to identify minimum safe distance from BWTW boundary line from housing. This may affect [housing numbers] on site and therefore overall viability.</p> <p>3. UU may wish to develop a Risk Assessment Plan and consult with their legal team over</p>	<p>Green Belt Review (Document 22.4 and appendices) was not considered for safeguarding. The boundary of BD087 has been drawn to exclude land in the flood plain.</p> <p>Land at Gillow Heath (BD062, BD068 and BD087) is the preferred location for safeguarding as it:</p> <ul style="list-style-type: none"> • Is less harmful to Green Belt purposes when compared with the alternatives • Suffers from fewer wider planning constraints (e.g. agricultural land classification and access). United Utilities have removed their objection <p>to the site as they cannot demonstrate that the land will be needed for their purposes in the future. However, their preference would still be for other locations.</p> <ul style="list-style-type: none"> • The land is being actively promoted for development and is therefore likely to deliverable when required. <p>The site boundaries have been drawn to</p>	

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												<p>potential future lawsuits against them from newly built sites and perhaps investigate a contingency fund plan. You need to take into account UU and EA position may take in any future development of these sites. BD062 and BD068 may be unviable. Would recommend a fully viability report is produced..and UU and EA confirm a safe distance from the water works for housing [construction]. May be built on FZ2/3. BD068 access road may be built on FZ2. In past no account taken of surface water issues.</p> <p>The Government has stated that flood plains should be avoided when other sites are available, flood prevention in Congleton area must be a top priority - these sites [exacerbate] this problem.</p> <p>Out of date information used to develop the Modified Plan</p> <p>SMDC Planning stated at 26 June meeting that they used findings from 2014/2015/2016 to justify their development/conclusion to support the Modified Local Plan. This excluded information from 2017/2018/2019.</p> <p>SMDC Planning was requested in 2015 to develop Level 2 SFRA flood risk analysis for BD087, in checking with the EA this has not been completed. There is only SFRA Level 1 on record.</p> <p>In 26/08/15 EA letter to SMDC clearly states that all other sites should be considered before this site. Sites BD062/BD068/BD087 were originally excluded during 2016 consultation. Modified Local Plan only identifies 12 sites from the original housing plan in 2014; originally 27 sites identified. BD062/BD068/BD087 were considered but excluded.</p> <p>1. BD062/BD068/BD087 were reintroduced May 2019 after Inspector rejected Plan - point out that BDNEW was to be removed from Plan as it was green belt. BD062/BD068/BD087 are all green belt.</p> <p>2. 2015 Green Belt report stated all 3x BD062/BD068/BD087 should only be considered under exceptional circumstances. But [recommendation for] BDNEW that should</p>	<p>exclude land in the flood plain. National planning policy requires the Council to have regard to the intended permanence of Green Belt boundaries in the long term, so that they are capable of enduring beyond the plan period. With this in mind, the Council has identified a cluster of three sites at Gillow Heath for safeguarding to meet development needs beyond the plan period. This has been necessary in Biddulph as it is surrounded by Green Belt which constrain the town's future development options. Exceptional circumstances for land released from the Green Belt for safeguarding must be demonstrated. The general approach to safeguarding was selected on the basis that:</p> <ul style="list-style-type: none"> • Additional housing allocations are not considered to be essential at this stage given that the Council can demonstrate it has sufficient housing supply to provide for 5 years (5.16) and 10 years without replacing site BDNEW with additional sites in 	

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												<p>be considered for future development. Question why GB report not been used as factual base for development of Biddulph.</p> <p>3. Biddulph Town Council had rejected all three sites from the Local Plan in 2015. The Biddulph Neighbourhood Plan 24/09/19 (most up to date and prepared with due diligence and public participation) - identifies all 3 sites as nature corridor and natural green space.</p> <p>SMD Executive Director clearly stated on 26/06 that modified SMDC Local Plan is supported by information 3-5 years old. Clear that SMDC not carried out all processes necessary to ensure that BD062/BD068/BD087 can be safely safeguarded for future building needs. Also clear that all other Staffs Moorlands/Biddulph area sites were not considered. Believe that without full process control in developing modified Plan, Plan should be sent back to SMDC for reconsideration. This will allow time for local input.</p> <p>Access to BD068 and BD087 - Road Safety Issues</p> <p>Public Safety Issue - land proposed for BD068 access road, and BD087 access bridge is only 1.5m above the normal river height (flash flood height 2.6m). This land is FZ2/3. It is only access road and bridge to BD068 and BD087 both enclosed sites. Question what will happen in flash flood event - is there Emergency Evacuation Plan; and question have emergency services been involved in site selection.</p> <p>Maximum river rise during flash flood = 2.6m. EA stated that river cannot be cultivated. In order to build 6m (4m+2m) single access road and bridge onto these sites a support wall will have to be approved for safeguarding in order to demonstrate it is possible given [marshy] ground condition.</p> <p>Please dismiss BD068/BD087 safeguarding until SMDC have liaised with all vested interests and provided all the necessary information (including SFRA Level 2/Public Safety Risk Report/Soil sample reports/SCC Transportation report) in order to ensure these sites can be put forward in future.</p>	<p>the Green Belt. Indeed, housing supply (for 10 years and plan period) can be boosted without any further Green Belt release by maximising capacity on existing allocations. As such, exceptional circumstances do not exist for additional allocations.</p> <ul style="list-style-type: none"> On balance, the principle of the identification of safeguarded land in Biddulph is deemed appropriate in order to provide potential opportunities for development in a future Local Plan review. Biddulph is one of three towns in the District but is the only one which is surrounded entirely by Green Belt. It is likely that some land outside the current town boundary will be necessary in order to support housing growth and the sustainability of Biddulph in the long term. It is supported by the Sustainability Appraisal. <p>This land is</p>	

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												<p>Question if SMDC not carried out necessary proprietary works they are pulling wool over people's eyes. Question if SCC committed to funding new road from A527 junction to the 2x site accesses. Would require compulsory purchase, and completion before construction begins. Ask SMDC to confirm they have agreement with SCC to fund/complete [these roadworks] within 10 years.</p> <p>No Buy in by the people of Biddulph</p> <p>Shortcutting of the Modification selection process is not acceptable.</p> <p>Question why these sites have been deemed Level 1 Building land given they were all excluded in 2016 as unsuitable. These sites are on flood plain and have soil issues - any housing/infrastructure on site would not be capable of being insured. Therefore no mortgage availability. Question who would be responsible for public liability insurance.</p> <p>Object to very late modification to SMDC Local Plan. Addition of safeguarded land without proper investigation especially into public safety issues and clear lack of public consultation could lead to legal action - expensive to Council.</p> <p>SMDC Planning identified 12 out of the original 27 Biddulph sites in 2015 and ranked BD087/BD068/BD062 as 1, prime building land - no other site in Biddulph ranked 1. 16x of the original 2015 Local Plan Biddulph sites were not even considered.</p> <p>At the meeting on 26/06/19 the Executive Director was asked 3 times why this land was ranked 1 given 2x of the sites have flooding issues; and why no other sites ranked 1 - no answer given.</p> <p>Failure to consider other sites together with lack of or no consultation since 26/06/19 - why these sites.</p> <p>Do not believe due process has been followed - questions Council motives. Asks Council to confirm all due diligence has occurred up front (not later on). Could prove to be expensive waste of time.</p>	<p>proposed for safeguarding and proportional evidence has been gathered. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323) as well as Biddulph Options Planning Analysis evidence published as part of the consultation material which provides details on the site selection process. As explained in the proposed new paragraph (main modification 12 on the schedule of main modifications) national planning policy makes it clear that safeguarding land is not the same as allocating land. The intention is that it is set aside to meet future needs (rather than needs within the plan period like an allocation). Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development so there is no guarantee that it will become an allocation. The land</p>	

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													<p>may not be needed in certain circumstances, for example - if the housing requirement for the District and / or spatial strategy changes in the future - but it provides a buffer to ensure that Green Belt boundaries around Biddulph have a degree of permanence.</p> <p>Main modifications to Policy SS6 clearly state that the land is not intended for development within the plan period (i.e. up to 2033):</p> <p>“Include areas of ‘safeguarded land’ at Gillow Heath (BD062, BD068 & BD087) between the urban area and the Green Belt, in order to meet Biddulph’s longer-term development needs. This land is not allocated for development at the present time. Planning permission for the permanent development of this land will only be granted following a Local Plan review which proposes the development”.</p> <p>National planning policy requires the Council to have regard to the</p>	

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													intended permanence of Green Belt boundaries in the long term, so that they are capable of enduring beyond the plan period. With this in mind, the Council has identified a cluster of three sites at Gillow Heath for safeguarding to meet development needs beyond the plan period. This has been necessary in Biddulph as it is surrounded by Green Belt which constrain the town's future development options. Biddulph Options Planning Analysis evidence published as part of the consultation material provides details on the site selection process. The process followed is in line with legislation.	
MMC153	Jehanne Thomas				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC181	Mr and Mrs Biddle				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC184	Mrs Paula Sherwin				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC174	Mr Matthew				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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	Hamilton													
MMC150	Mrs M Bowyer				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC154	Mr John Hamilton				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC175	J Smith				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC213	Miss Jane Field	Planning Specialist Environment Agency			MM12							In relation to the safeguarding of land at Gillows Heath (MM12) have no objection to this land being removed from the greenbelt. Specifically note text which clarifies that 'This land is not allocated for development at the present time. Planning permission for the permanent development of this land will only be granted following a Local Plan review which proposes the development'. We do however have concerns regarding the suitability of this land in terms of its susceptibility to flooding which may affect its ability to meet future needs, and if not taken into consideration now will need to be addressed should this land come forward for development as a site allocation or a planning application in the future. The site boundaries of BD068 and BD087 have been drawn along the line of the floodplain as identified within your Level 1 Strategic Flood Risk Assessment (SFRA) which is based upon our Flood Map for Planning. We assume this has been specifically undertaken to ensure the sites lie wholly within Flood Zone 1. Our flood mapping at this location is indicative only and based on JFLOW modelling which provides a broadbrush indication of areas which may be at risk. Should these sites (and also potentially BD062) come forward to be allocated for development at a later stage we would therefore look for Level 2 Strategic Flood Risk Assessments to be undertaken in support of their allocation, due to their close proximity to the floodplain, and uncertainty about the accuracy of the mapping in this location and may affect the capacity of the sites for built development and affect the sites layout. This	Comments noted. The site boundaries for BD062, BD068 and BD087 have all been drawn to ensure the sites lie wholly within Flood Zone 1. If these sites are considered for allocation in the future engagement will take place with the Environment Agency in relation to any specific requirements needed to justify any allocation. It is noted that this is not required to justify safeguarding of the sites.	If the Inspector considers it appropriate, an addition to Policy SS6 or the supporting text could be made to flag that Biddulph Brook is a main river in this location and include the details suggested above.

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												<p>would not however be required for the land to be safeguarded.</p> <p>As the Biddulph Options Planning Analysis document clarifies, the same level of detailed information as would be needed for an allocation is not necessarily required when land is safeguarded as the position would be reviewed in the next plan before an allocation was made. We are happy that the proximity to the floodplain was acknowledged within this assessment, however we would also recommend it is flagged that the Biddulph Brook is at this location, a Main River and as such we would require a minimum 8m development easement to be maintained from the top of the bank of the brook, in order to provide essential space for overland flood flows, essential flood defence maintenance work and as a green corridor for water-based ecology.</p> <p>As the sites are located within low risk Flood Zone 1 only, the Sequential Test would not be required to be undertaken in order for them to be allocated.</p>		
MMC19 2	Kezia Taylerson	Historic England			MM12							<p>Concerns about safeguarding three sites for potential development in Gillow Heath, within the Local Plan, at this time. Recognise that the text states that there will be a Local Plan Review in order to be released officially and considered an allocation, we are unclear as to why they have been included at this time.</p> <p>What assessment has been undertaken to consider whether the principle of development in these areas is likely to be acceptable? It is possible that prospective developers will consider their inclusion in the Plan as safeguarded land, as land that has the potential to be suitable for the use they have been safeguarded for, when we are not clear that this has been established. We would be grateful to see heritage impact assessment reports for these sites and comment on these or would recommend that they are included as potential allocations in a Local Plan Review and not as safeguarded sites at this time.</p> <p>Further paragraph 6 relates to planning permission being required for the 'permanent' development of this land which is a misleading statement.</p>	The Council's committee report from 26th June 2019 and associated documents explain the process which has been followed and why. The 2012 NPPF (upon which this plan is being examined) covers safeguarding and the term 'permanent development' is used in paragraph 85.	No change.

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MMC186	Mrs Kathleen Boulton				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC148	Mrs M Vickers				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC182	Mr Michael Biddle				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC230	Mrs P Newton				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC220	Mrs Ann-Marie Cumberbatch				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC237	Mrs V Jackson				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC239	Mr J Robertson				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC235	Mrs Ruth Shepherd-Cole				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC221	Mr Mark Cumberbatch				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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MMC241	Mr L. Cradleton				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC253	Mr Samuel Breed				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC236	Mr Benjamin Murphy				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC180	Mr A.J Wright				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC232	Mr Ben Shepherd-Cole				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC242	Mr Stephen Bennett				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC244	Mrs Margaret Mitchell				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC238	Mr A Lehepoo				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC248	Mrs Jacqueline Hughes				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC25	Mr				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to

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0	Matthew Chaddock													MMC256.
MMC226	Mr B.W. Newton				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC246	Mr Richard Scarlett				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC252	Mr J Hodgson				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC255	Miss Nicola Cooper				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC251	Mrs V Austin				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC271	Mr B Bainbridge				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC282	Mr G Holford				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC292	Mrs Barbara Clews				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC288	Mrs S				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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	Goodwin													
MMC298	Mr Roger Chadwick				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC240	Mrs Marjorie Dawson				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC256	Mrs Angela Turner				MM12		No	No	No	No	No	<ul style="list-style-type: none"> - The SMDC Phase 1 Ecological Survey evidence base was being ignored in the ranking exercise which led to the identification of the safeguarded sites. The agricultural land classification used in the rankings is wrong. - Evidence in the February 2018 SA relating to ecology was not taken into account. - SMDC has failed to take into account Section 40 of the Natural Environment and Rural Communities Act 2006. - Fails to deliver Local Plan vision (net gains and improvements to biodiversity will be made). - Assessment for Local Wildlife Sites by Ecus (2017) was incorrectly carried out. Methodology is not sound. - Habitat mapping within the Biddulph area is lacking, SMDC local plan decisions are being made on an old evidence base and SMDC are failing in their duty to co-operate. - Development densities have not been lowered to take known biodiversity into account throughout any of this local plan process. - Removing the Gillow Heath Fields from the green belt and designating them as 'safeguarded sites' (MM12) for future development (especially BD062) is in direct conflict with the emerging Biddulph Neighbourhood Plan. 	<p>Proportional evidence has been gathered for each site. In contrast to site allocations which need to be delivered within the plan period, a more long-term view of constraints for safeguarded land can be taken. Also, the same level of detailed information as would be needed for an allocation is not necessarily required when land is safeguarded as the position would be reviewed in the next plan and would include assessment of up to date evidence at that time including ecological surveys before an allocation was made.</p> <p>Site visits did take place as part of ecological assessments. The work was not all just desk based.</p> <p>In their response to this consultation, the Environment</p>	To further emphasise that ecology, flooding and other relevant issues will be considered as part of any site allocation, it is suggested that if the Inspector considers it appropriate, an amendment to Policy SS6 could be made. For example, addition of wording such as "Any future development of the sites would require consideration of matters such as ecological surveys, layout, residential amenity and flood plain boundaries".

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												<p>- Removing the Gillow Heath Fields from the green belt and designating them as 'safeguarded sites' MM12 for future development (especially BD062) is in direct conflict with Vision, Spatial Aims, Spatial Objectives and Policies of the new SMDC Local Plan Submission Version (February 2018).</p> <p>- BD062 and BD068 are both immediately adjacent to a sewage works.</p> <p>- The local community has had unfettered access to BD062 for over 40 years - there has been total open access and the land has been used by local residents for events and walking dogs.</p> <p>- Inadequate access roads.</p> <p>- BD062 (land at end of York Close / Essex Drive) suffers from a high amount of surface water flooding.</p> <p>- Both BD087 and BD068 suffer from fluvial flooding, often contaminated from the issue of raw sewage flooding at the end of Essex Drive.</p> <p>- In order for the local plan to be sound, BD062 needs to be retained within the Greenbelt, the biodiversity protected and enhanced and the field allowed to flood (MM12) along with BD068 and BD087.</p> <p>- I notice that you omitted part of your evidence base when you made decisions about these sites on 26th June 2019 at the Council Assembly. You omitted the ecological evidence base and also incorrectly stated that these fields are urban / industrial land, which is incorrect.</p> <p>- The decision to safeguard fields in Gillow Heath needs reconsidering both in light of your errors and in light of the evidence contained within the emerging Biddulph Neighbourhood Plan (REG14 closing 4th November 2019).</p>	<p>Agency say that if the sites come forward for development at a later stage they would require a Level 2 Strategic Flood Risk Assessment because they are within close proximity of the floodplain and this may affect capacity and layout. However, they state that this would not be required for the land to be safeguarded.</p> <p>The capacity of the sites in relation to other constraints have been considered. For example, evidence from the BD062 landowner odour impact study has resulted in a lower capacity than originally proposed on that site. The density is now only around 25 dwellings per hectare. Ecology evidence from the Council and the landowner's own more recent studies do not render BD062 undevelopable due to specific ecological constraints. Ecological links with the Biddulph Valley Way could be incorporated into a potential layout scheme for BD062, for example.</p>	

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MMC285	Mr Peter Moore				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC287	Mrs Anne Thompson				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC291	Mr C Goodwin				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC293	Mrs Lisa Flanagan				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC295	Ms Ann Gratton				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC297	Mr Bernard Kellett				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC294	Mr Michael Flanagan				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC302	Mrs Lora Barker				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC310	Mr Derek Hall				MM12							Object to inclusion of BD 062, BD 068 and BD 087 due to: - Poor access to sites. - Flooding / exacerbate existing problem where in heavy rainfall manholes blow discharging sewage.	The Highway Authority has not objected. United Utilities have not objected and the Environment Agency does not	Refer to MMC256.

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												- Cost of infrastructure would make the sites unviable. - Would like to see sites removed from Local Plan.	object to the safeguarding of the sites for future development. All of the sites have landowners who are willing to release the land for development and consider delivery of the sites to be viable.	
MMC312	Mr William Summerscales				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC306	Mr Phillip Thompson				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC317	Mr Matthew Breed				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation MMC256.
MMC296	Mr Sid Gratton				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC315	Mr Nigel Cooper				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC269	Mrs V A Bainbridge				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC254	Ms Tracy Hodgkinso				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.

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	n													
MMC303	Mrs Annette Summerscales				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC305	Mrs Diane Condliffe				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC299	A J Hague				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC301	Mr Peter Wilshaw				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC313	Mrs Tracey Cooper				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC283	Mr Paul Malkin				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC318	Mrs Heather Holford				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC323	Mrs J Banister				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on MMC256.
MMC319	Ms Barbara Griffiths				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC327	Mrs				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to	Refer to recommendati

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	Lucy Gratton												MMC179.	on to MMC256.
MMC308	Ms Karen Murphy				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC325	Mr J Banister				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC321	Mr Mike Smith				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC326	Miss Natasha Worrall				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC316	Mr Brian Mason				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC330	Mr Lee Worrall				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC309	Mrs Karen Chadwick				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC328	Mr Gary Worrall				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC332	Mrs Avril				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.

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	Worrall													
MMC339	Mr K Wilshaw				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC341	Mrs Susan Wilshaw				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC337	Mrs J.A. Bennett				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC349	Ms Doreen Whatley				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC351	Mr A Hague				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC357	Mr James Stringer				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC359	Mrs V Woodward				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC345	Ms Debbie Jukes				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC363	Mr Christopher Brough				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.

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MMC365	Mrs J Clowes				MM12			No	No	No	No	See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC344	Mr Michael Martin				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC336	Mrs Beverley Holding				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC352	Mr Peter Stonier				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC354	Mrs Glenys Machin				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC358	Mrs Rebecca Stringer				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC342	Mr P Shufflebottom				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC334	Mr Mark Davies				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC361	Mrs Susan Heath				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC37	Dr				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard	Refer to

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1	Steven Beasley												officer response to MMC179.	recommendation to MMC256.
MMC375	Mrs Elizabeth Sutton				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC377	Mrs Phyllis Kasperowicz				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC379	Mr P Squires				MM12			No	No	No	No	See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC381	Mrs J Ebdon				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC369	Mr Michael Murphy				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC388	Mr Matthew Gratton				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC360	Mrs Veronica Tinsley				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC368	Mr Richard Sutton				MM12	No	No	No	No	No	No	Refer to standard summary in MMC179 and Question 3 above.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC362	Mr				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to	Refer to recommendati

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	Chris Heath												MMC179.	on to MMC256.
MMC372	Mrs D Squires				MM12			No	No	No	No	See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC376	Ms Sue Croucher				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on to MMC256.
MMC348	Mr M Jukes				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on to MMC256.
MMC370	Mrs Alison Beasley				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on to MMC256.
MMC382	Mrs Elaine Guy				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC384	Mr P Price				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on to MMC256.
MMC387	Mrs Natalie Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on to MMC256.
MMC389	Valerie Kirkham				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on to MMC256.
MMC378	Mr Chris Croucher				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation on to MMC256.

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MMC393	Mr & Mrs S & C Fielding				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC366	Mrs L Price				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC397	Mr A Forrester				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC391	Mr Cyril Kirkham				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC395	Mrs Janine Exon				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC380	Mr Paul Kasperowicz				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC401	Mr Jeffrey Leese				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC405	Mr A Copeland				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC383	Mr Richard Whitehurst				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments (Sutton R 4).	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC36	Mrs				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard	Refer to

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7	Donna Stonier												officer response to MMC179.	recommendation to MMC256.
MMC390	Mr Christopher Exon				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC398	Mrs Grace Forrester				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC400	Mr David Sanderson				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC386	Mr Torben Clowes				MM12			No	No	No	No	See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC396	Mrs Frances Rodgers				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC406	Mr A Jones				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC394	Miss L Delves				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation to MMC256.
MMC411	Mrs Julie Cunningham				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC41	Mrs				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard	Refer to

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3	Kimberley Alcock												officer response to MMC179.	recommendation within MMC256.
MMC415	Mrs Susan Wilshaw				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC417	Ms Jill Scarlett				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC419	Miss Alexei Pearl				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC421	Miss Eloise Pearl				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC423	mr Stephen Willott				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC425	Mrs Danielle Sullivan				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC427	Mr John Whatley				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC399	Mrs Barbara Kingsley				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC431	Mr Chris				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within

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	Morris													MMC256.
MMC408	Ms Diane Copeland				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC404	Mrs Paula Rowley				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC414	Miss Eloise Pearl				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC416	Mr and Mrs C.B. Dodds				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC422	Ms Ann Gratton				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC424	Miss Laura Young				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC412	Mr and Mrs B Webb				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC428	Mr Mark Hurst				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC426	Mrs Carly				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within

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	Brough													MMC256.
MMC586	Mr Graeme Court				MM12							Refer to summary in MMC583.	Refer to officer response to MMC256.	Refer to MMC256.
MMC418	Mr Steve Clowes				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC464	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM12							<ul style="list-style-type: none"> - Para 7.50: The emerging Biddulph Neighbourhood Development Plan also encourages the re-use of buildings for residential accommodation. It is important for the Local Plan to recognise here and in other sections that neighbourhood plans can also include policies to help deliver growth. - New Paragraph between 7.50 and 7.51: Suggest re-wording this to 'Biddulph Town Centre Boundary' for clarity and to avoid confusion. - Policy SS6 Bullet Point 1: This has been modified to remove the requirement for starter homes. The Housing Needs Assessment April 2018 by AECOM to support the neighbourhood plan concluded that other forms of tenure should be encouraged such as 'shared ownership, starter homes and the private rented sector.' To remove the reference to starter homes is at odds with recent evidence on housing need. - Policy SS6 Bullet Point 6: Consider text should be amended to say 'removed from the Green Belt and designated as Safe Guarded land' to make clear the transition, if this is agreed. - Concerns about process of safe-guarding and lack of liaison with the Town Council regarding this. They are proposed Local Green Space designations in the emerging Biddulph Neighbourhood Plan which follows two rounds of consultation. There is therefore a conflict between the Local Plan and the Neighbourhood Plan documents. - There is more up to date ecological 	<ul style="list-style-type: none"> - Policy SS4 recognises the contribution Neighbourhood Plans can make to housing delivery. - It is not considered necessary to re-word the text to refer to 'Biddulph Town Centre Boundary'. This wording would then create an inconsistency with all the other settlements. - The deletion of the requirement for starter homes reflects the latest affordable housing definition. - It is agreed that the wording of bullet point 6 could be amended to make clear that the safeguarded land has been removed from the Green Belt if the Inspector considers this to be necessary. - 2012 NPPF para. 	To further emphasise that the land has been removed from the Green Belt and designated as 'safeguarded land', it is suggested that if the Inspector considers it appropriate, an amendment to the wording of Policy SS6 could be made.

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												<p>information available for Biddulph and the safeguarded sites as part of work on the Neighbourhood Plan. Do not see how the Phase 1 Ecological Survey evidence has been applied in the assessment to create safeguarded land?</p> <p>- Flood risk is a further issue as the safeguarded sites are being proposed without clearly understanding if they are developable.</p>	<p>16 requires Neighbourhood Plans to support the strategic development needs set out in Local Plans.</p> <p>- It is unclear as to how the Town Council's ecological evidence has been derived. It appears to be a collection of data set out on maps with no background report or other explanatory narrative.</p> <p>- In their response to this consultation, the Environment Agency say that if the sites come forward for development at a later stage they would require a Level 2 Strategic Flood Risk Assessment because they are within close proximity of the floodplain and this may affect capacity and layout. However, they state that this would not be required for the land to be safeguarded.</p>	
MMC409	Mr Anthony Kirkham				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC429	Mrs Eileen				MM12	No	No	No	No	No	No	Refer to standard attachment.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.

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	Smith													
MMC407	Mrs Carole Kirkham				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC534	Mrs Kathleen Boulton				MM12	No	No	No	No	No	No	Refer to summary within MMC486.	Refer to officer response within MMC486.	Refer to recommendation in MMC486.
MMC536	Mrs Kathleen Boulton				MM12	No	No	No	No	No	No	Refer to MMC488 summary.	Refer to MMC488 officer response.	Refer to MMC488 recommendation.
MMC430	Ms Heather Mason				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC522	Mr & Mrs S & C Fielding				MM12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC502.	Refer to MMC256.
MMC438	Mrs Angela Sproston				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC510	Mr Christopher Slater				MM12	No	No	No	No	No	No	Refer to summary contained in MMC488	Refer to officer response in MMC488.	Refer to recommendation within MMC256.
MMC512	Mr Christopher Slater				MM12	No	No	No	No	No	No	Refer to summary within MMC486.	Refer to officer response within MMC486.	Refer to recommendation within MMC256.
MMC572	Ms Doreen				MM12							Refer to MMC563 summary.	Refer to MMC563 officer response.	Refer to MMC256 recommendation.

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	Whatley													
MMC535	Mrs Kathleen Boulton				MM12	No	No	No	No	No	No	Refer to MMC485 summary.	Refer to MMC485 officer response.	Refer to MMC485 recommendation.
MMC521	Mr & Mrs S & C Fielding				MM12	No	No	No	No	No	No	Refer to summary within MMC486.	Refer to office response in MMC486.	Refer to recommendation in MMC486.
MMC454	mrs ANNE YOUNG				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC509	Mr Christopher Slater				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC511	Mr Christopher Slater				MM12	No	No	No	No	No	No	Refer to MMC485 summary.	Refer to officer response within MMC485.	Refer to MMC256 recommendation.
MMC513	Mr Christopher Slater				MM12	No	No	No	No	No	No	<p>No buy in by the people of Biddulph</p> <p>Short cutting of the Modification selection process is not acceptable.</p> <p>Question why have these sites been deemed Level 1 Building land given..they were all excluded in 2016 as unsuitable. These sites are on floodplain and have soil issues. A neighbour [2.5m from BD068] was creating rainwater runoff soakaway in garden - [they] discovered a deep deposit of very soft running sand.</p> <p>Presence of running sand confirmed by British Geological Survey who state: ..sandy layers can become fluidised by [flowing] water..such sands can 'run', removing support for overlying buildings...Running sand hazards can occur where excavations go below water table, where springs occur..around leaking drains or</p>	<p>Refer to officer response to MMC179.</p> <p>Refer to officer response to MMC502.</p>	Refer to recommendation within MMC256.

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												<p>mains water..pipes or [when sand bodies vibrated]...</p> <p>Construction on this site would..allow..the sand to run causing subsidence and damage to existing properties..for which..SMDC may be partially liable. [Therefore] [new development would be uninsurable]. Thus no building insurance..[would mean]..no mortgage availability.</p>		
MMC502	Mrs Wendy Boothroyd				MM12	No	No	No	No	No	No	Refer to MMC179.	<p>Refer to officer response to MMC179.</p> <p>The site boundaries have been drawn to exclude land in the flood plain.</p> <p>The Council sent emails or postcards out to all individuals and organisations who have previously commented on the Local Plan or asked to be kept informed to let them know about the consultation. This amounted to over 10,000 addresses.</p> <p>The timetable for the examination process is set by the Inspector and it is normal for Main Modifications to come at this time. The 6 week consultation period is in line with legislation as is the process followed.</p>	Refer to recommendation within MMC256.
MMC490	Ms Ann Gratton				MM12	No	No	No	No	No	No	Refer to summary contained in MMC486.	Refer to officer response to MMC486.	Refer to recommendation in MMC256.
MMC48	Mr				MM12	No	No	No	No	No	No	Marsh Green Rd does not meet the minimum	These sites were	Refer to

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6	Sid Gratton											standards for the Staffordshire County Council residential design guide policy. The road is too narrow and there is pinch point on MG Rd bridge before BD067 access. MG Rd too narrow along total length & [mostly] no footpath. Road widening will require compulsory purchase of gardens near..Congleton Rd junction. MG Rd falls below minimum required of distributor roads by the residential design guide..[this states] that minimum acceptable local distributor road width 6.7m; MG Road 3.25m wide.	included as options during an earlier Local Plan consultation in 2016 and the issues of noise, odour, highways / access, flood risk and ecology etc. were all considered at that time. Refer to Biddulph Topic Paper (Document 13.2). Relevant references are: BD062 (pages 217-237), BD068 (pages 258-280), BD087 (pages 303 – 323).	recommendati on within MMC256.
MMC488	Mr Sid Gratton				MM12	No	No	No	No	No	No	Refer to MMC256.	Refer to MMC256.	Refer to MMC256.
MMC448	Mrs Maureen Brindley				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC473	Mr Paul Alcock				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendati on within MMC256.
MMC436	Mr Ross Boardman				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendati on within MMC256.
MMC576	Mr M Hilton				MM12	No	No	No	No	No	No	BD087 has never been built on - contrary to land owner's claims.	Identification of site is not dependant on it being previously developed.	No change.
MMC578	Mr M Hilton				MM12	No	No	No	No	No	No	Health concerns United Utilities have stated their preference for other sites to be considered.	See response to MMC256.	Refer to recommendati on within MMC256.

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												<ul style="list-style-type: none"> - Odour concerns. - Risk of infectious disease due to climate change and proximity of sewage works. A safe distance is required. - Risk of future law suits against United Utilities - Concerns of building on flood zones 2/3. 		
MMC582	Mr M Hilton				MM12	No	No	No	No	No	No	<p>Access to BD068 and BD087 - Road Safety Issues</p> <p>Access road is in flood zone 2/3. Is there an emergency evacuation plan?</p> <p>Have SCC committed funding to the road?</p> <p>Land is a marsh.</p> <p>SFRA level 2 required</p>	<p>SCC deemed access is achievable.</p> <p>SFRA level 2 not required at this stage.</p>	No change.
MMC584	Mr M Hilton				MM12	No	No	No	No	No	No	<p>No buy in from the people of Biddulph. Late changes to plan are not acceptable.</p> <p>Why are sites now included when they were excluded in 2016?</p> <p>Flood issues will lead to insurance and mortgage difficulties.</p>	<p>Modifications subject to consultation.</p> <p>See MMC256 regarding flood risk.</p>	Refer to recommendation within MMC256.
MMC501	Mrs Wendy Boothroyd				MM12	No	No	No	No	No	No	Refer to summary contained in MMC179.	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC489	Ms Ann Gratton				MM12	No	No	No	No	No	No	Refer to summary contained in MMC485.	Refer to officer response to MMC485.	Refer to recommendation in MMC256.
MMC491	Ms Ann Gratton				MM12	No	No	No	No	No	No	Refer to summary contained in MMC488.	Refer to officer response to MMC488.	Refer to recommendation in MMC256.
MMC485	Mr Sid Gratton				MM12	No	No	No	No	No	No	Refer to MMC256.	Refer to MMC256.	Refer to MMC256.

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MMC458	Mrs D Jacobs				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC437	Mrs Wendy Squires				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC445	Mrs S Leese				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC433	Mr Ronald Hickman				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC435	Mr Timothy Sproston				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC587	Mr David Sanderson				MM12	No	No	No	No	No	No	BD087 I have lived in Biddulph since birth. There has never been buildings on this land contrary to the land owner's claims. My mother and uncle also do not believe that there have been buildings on the land.	The case for safeguarding the land is not predicated on it being previously developed.	No change.
MMC577	Mr M Hilton				MM12	No	No	No	No	No	No	Out of date information used to develop the plan. - SFRA level 2 assessment as requested by the EA in 2015 has not been completed. - 27 alternatives were originally considered - All sites are in the green belt. The green belt review states that they should only be released in exceptional circumstances - the sites have been rejected by the neighbourhood plan	SFRA level 2 is not required (see representation from Environment Agency) The exceptional circumstances for green belt release in Biddulph have been established. Options assessment table sets out the reasons why options were assessed and why	Refer to recommendation within MMC256.

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													the preferred option was chosen. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. Safeguarded land is considered to be strategic.	
MMC579	Mr M Hilton				MM12	No	No	No	No	No	No	The Environment Agency have raised concerns about BD062, 068 & 87 in terms of flood risk. The Environment Agency and United Utilities have requested that all other options be considered. What is the point in safeguarding land if no building will happen in the future?	See response to MMC256.	See MMC256.
MMC504	Mr Mathew Brindley				MM12							Refer to standard summary within MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC492	Mrs Natalie Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC486.	Refer to officer response to MMC486.	Refer to recommendation in MMC486.
MMC494	Mrs Natalie Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC488.	Refer to officer response to MMC488.	Refer to recommendation in MMC488.
MMC498	Miss Eloise Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC485.	Refer to officer response to MMC485.	Refer to recommendation in MMC485.
MMC500	Miss Eloise Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC488.	Refer to officer response to MMC488.	Refer to recommendation in MMC488.
MMC514	Mr Steve				MM12	No	No	No	No	No	No	Refer to MMC368 summary.	Refer to standard officer response to MMC179.	Refer to recommendation within

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	Clowes													MMC256.
MMC516	Mr Steve Clowes				MM12	No	No	No	No	No	No	Refer to summary within MMC485.	Refer to officer response within MMC485.	Refer to recommendation within MMC485.
MMC518	Mr Steve Clowes				MM12	No	No	No	No	No	No	Refer to summary to MMC502.	Refer to MMC502 officer response.	Refer to MMC502 recommendation.
MMC496	Miss Alexei Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC486.	Refer to officer response to MMC486.	Refer to recommendation in MMC486.
MMC432	Mr Carl Mason				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC583	Mrs Janet Court				MM12							<p>1. I believe the removal of the Gillow Heath sites adjacent sewage works are not sustainable environmentally, economically or infrastructure [terms] . I note these sites were removed from the plan after being preferred sites in [earlier] draft. Question why now reinstated. Question what are exceptional circumstances to [justify classification as] prime safeguarded land [as per para 135 NPPF].</p> <p>2. When the original draft of the Local Plan was made public..many residents commented on various aspects..including choice of [4x] sewage works sites. Concerns remain the same:..flood risk [changing climate], smells, noises, flies, surrounding roads are [only narrow farm tracks], Congleton Rd junction overburdened with traffic..</p> <p>3. Biggest complaint is..modified plan..takes no account of environmental assessments [of] Biddulph Neighbourhood Plan Working Group, even though..draft document sent to SMDC May 2019 [before] modified Local Plan..This is a dereliction of [Council] duty to take all matters into account..</p>	Refer to officer response to MMC256.	Refer to MMC256.

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												4. Proposed Portland Drive and Marsh Green Rd sites are valuable pasture land [with] grazing cattle..for silage production..this should be taken into account as Brexit approaches farming [will become] more self sustainable. 5. Extremely concerned local infrastructure (PCT, schools capacity) already overstretched..		
MMC503	Mrs Sophie Brindley				MM12							Refer to standard summary within MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC493	Mrs Natalie Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC485.	Refer to officer response to MMC485.	Refer to recommendation in MMC485.
MMC499	Miss Eloise Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC486.	Refer to officer response to MMC486.	Refer to recommendation in MMC256.
MMC515	Mr Steve Clowes				MM12	No	No	No	No	No	No	Refer to summary to MMC486	Refer to officer response to MMC486.	Refer to recommendation in MMC256.
MMC517	Mr Steve Clowes				MM12	No	No	No	No	No	No	Refer to summary to MMC488.	Refer to MMC488 officer response.	Refer to MMC488 recommendation.
MMC495	Miss Alexei Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC485.	Refer to officer response to MMC485.	Refer to recommendation in MMC485.
MMC497	Miss Alexei Pearl				MM12	No	No	No	No	No	No	Refer to summary contained in MMC488.	Refer to officer response to MMC488.	Refer to recommendation in MMC488.
MMC563	Mr John				MM12							Re: Site Options consultation. BD087/068/062 I express my strong objections and concerns:	Refer to officer response to MMC179.	See MMC256.

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	Whatley											<p>1. Green Belt/ Green Field - Proposed land forms part of Green Belt/ Green Field around Biddulph. Biddulph Valley is beautiful place to visit. Close proximity of Biddulph Grange detracts from the overall rural views. Purpose of GB is to protect land around urban centres from urban sprawl and to preserve and protect habitat for wildlife and conservation issues. Proposed sites are home to many types of wild animal...Concern that development will impact on environment/wild habitat..</p> <p>2. Environmental considerations/ flood plain - proposed development will run N-S along brook. Proposed land 60% floodplain and on local water table line. Brook 2m wide..fast flowing..1.5m below flood plain..Major flooding [occurred] 20 years ago..BD087/068/062 propose 100 houses [on] east [side] close..to brook. Brook narrows at north end..development waste water will go into brook, increased water volume would have potential [for] severe localised flooding. Increased flow rates..would also cause severe bank and flood properties and roads downstream.</p> <p>3. Disposal of sewage - development approximately a few metres from sewage works boundary therefore a restriction on further sewage works expansion. Sewage from proposed northern houses would [require] pumping to sewage. Site is higher in south than north and sewage tank/pump would need to be located at lowest point of flood plain. At some point this area will be flooded therefore question how will the flood water be prevented from entering sewage and inevitable leaking contaminating the brook/adjacent land.</p> <p>4. Highways/road safety issues - access [would be] off Marsh Green Rd..the most dangerous road in Biddulph. Access from MG Rd will require considerable excavation work to make the lane wide enough for two lanes of traffic and in addition the bridge over the brook would need to be [widened for] for two lanes of traffic and..bridge [widened] and strengthened..causing traffic congestion and [affecting] access to sewage works. MG Rd [narrowest point] 2.5m..insufficient for two cars passing, reducing to single [lane] traffic.</p>		

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												<p>Absence of pavement in MG Rd major safety concern...</p> <p>Beaumont Close extremely difficult to access from MG Rd..only wide enough for 1 vehicle..Beaumont Close/MG Rd junction at 90degree angle. This [prevents] larger vehicles..turning into BC. [Presently]..larger vehicles unable to drive into BC, has to be reversed in. Junction MG Rd/Congleton Rd only 5.5m including pavement..Only room for two cars side by side [not lorries..]. [This] junction is in a [road] dip..reducing visibility from either direction..a potential road safety hazard. Currently Congleton Rd has a recorded flow rate up to 1000 vehicles/hour [add to this] the traffic from the proposed development sites [from] MG Rd.. Meaning increase in traffic volume MG Rd/Congleton Rd junction and require major alterations to junction and MG Rd...This [raises] road safety concerns.</p> <p>5. Major concerns that majorinty of proposed developments in north of valley thus putting new population at wrong end of valley from schools/amenties..causing increased traffic flow through town at peak times, increased volume on MG Rd/Congleton Rd. Vehicle movement would also increase as..no public transport from north of valley to town centre.</p> <p>6. Noise pollution - there would be disturbance/noise pollution resulting from 100+houses [meaning] at least 300+ new residents in small area. [3x sites] in a valley that produces echo effect which will amplify any additional noise..</p> <p>I strongly object on the grounds that it would create many adverse effects. Planning should be rejected.</p>		
MMC439	Mrs Lynne Boardman				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendati on within MMC256.
MMC450	Mr Paul Hammond				MM12			No	No	No	No	See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.

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MMC440	Mrs Lesley Linney				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC446	Mrs V Harries				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC455	Mrs Betty Walley				MM12	No	No	No	No	No	No	Refer to standard attachment.	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC457	Mrs Debbie Burgess				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC459	Mr John Jacobs				MM12	No	No	No	No	No	No	Refer to comments under: - Lack of due process control - Out of date information used to develop the Modified Plan - Access to BD068 and BD087 - Road Safety Issues - No Buy in by the people of Biddulph in MMC179 attachment.	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC477	Mrs Linda Stronge				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC442	G Hood				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC483	Mr Neil Beardmore				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC506	Mr				MM12	No	No	No	No	No	No	Refer to response summary at MMC179.	Refer to officer response to	Refer to recommendati

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	David Boothroyd												MMC179	on within MMC256.
MMC520	Mr Clifford Fielding				MM12	No	No	No	No	No	No	Refer to MMC502 summary.	Refer to MMC502 officer response.	Refer to MMC256 recommendation.
MMC461	Mrs Denise Millward				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC481	Mr Steven Bartle				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC447	Mr and Mrs D Bailey				MM12							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC456	Mrs Dorothy Wood				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC460	Mrs Jackie Fern				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC462	Ms Theresa Lee				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC474	Mr Graham Wood				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC443	Mrs Kay				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within

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	Williams													MMC256.
MMC480	Mrs Sarah Bartle				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC441	D Elms				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC507	Mr David Boothroyd				MM12	No	No	No	No	No	No	Refer to summary contained in MMC502. [Also refer to attached photo].	Refer to officer response to MMC502.	Refer to recommendation within MMC256.
MMC519	Mr Clifford Fielding				MM12	No	No	No	No	No	No	Refer to MMC486 summary.	Refer to MMC486 officer response.	Refer to MMC256 recommendation.
MMC444	Mr Chris Williams				MM12	No	No	No	No	No	No	See standard summary in MMC179.	Refer to standard officer response to MMC179.	Refer to recommendation within MMC256.
MMC478	Mrs Sarah Beardmore				MM12	No	No	No	No	No	No	Refer to MMC368 text and attachments.	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC476	Mr Tony Stronge				MM12	No	No	No	No	No	No	Refer to Summary contained in MMC179.	Refer to officer response to MMC179.	Refer to recommendation within MMC256.
MMC104	Councillor (Biddulph West) Alistair McLoughlin				MM12, MM21, MM39	No	No	No	No	No	No	<ul style="list-style-type: none"> - The three options for the Wharf Road Site Masterplan have been prepared without consultation with the public or Biddulph's elected Town Councillors. - The sports provision for the Wharf Road Masterplan is significantly less than the existing provision. - Proposed access in masterplan is inadequate. 	The principle of development on this site has been accepted. The main modifications consultation simply addresses detailed amendments to the policy. It refers to the increased number of houses which can be	No change.

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												<ul style="list-style-type: none"> - Number of landowners will lead to delays in its development. - Retail should be nearer to town centre. - A public consultation must now take place. 	<p>accommodated on the site as a result of masterplan work and states that layout details (e.g. position of retail, sports pitches, access) will be determined as part of the masterplan. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document from the Local Plan. In any case before the site could be developed it would need planning permission and residents plus the Town Council would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan.</p>	
MMC105	Councillor (Biddulph West) Alistair McLoughlin				MM12, MM39, MM41	No	No	No	No	No	No	<ul style="list-style-type: none"> - Inadequate public consultation. - Object to inclusion of improvements to Victoria Row in the document as it is privately owned. - Site layout not acceptable for local residents - visual impact, noise. - Impact on local highway network. - Failure to investigate mining legacy. - More work on ecology needed. 	<p>The principle of development on this site has been accepted. The main modifications consultation simply addresses detailed amendments to the policy. It refers to the increased number of houses which can be accommodated on the site as a result of masterplan work and states that layout details (e.g. position of access, housing and employment uses)</p>	No change.

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													will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document which was consulted upon separately from the Local Plan. In any case before the site could be developed it would need planning permission and residents plus Biddulph Town Council would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan. Mining legacy on the site has been investigated and does not deem the site undevelopable.	
MMC103	Councillor (Biddulph West) Alistair McLoughlin				MM12 and MM21		No	No	No	No	No	See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC300	Mr D Hawley				MM12 doc ref E/F	Yes	No	No	No	No	No	BD062, BD068 and BD087 - There are concerns with the process of selecting these sites, out of date information was used.	See standard officer response in MMC256.	See MM256.

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												<ul style="list-style-type: none"> - Data provided by the Biddulph Neighbourhood plan was ignored this included up to date mapping, Environmental and Biodiversity data. - The sites have environmental and biodiversity value including wildlife trails, protected species and rare plants. - The sites are on a floodplain and regularly flood after heavy rain, they are close to the sewerage works and consequently undesirable material is evident when these floods take place. - The closeness to the sewerage works would mean that no future expansion could take place which is likely in the event of the number of additional dwellings proposed in the town. - In fact BDNEW which they are replacing is a far better option as a safeguarding site than these. - The process of proposing safeguarding sites should be reviewed and the most up to date data should be used with further consultation with the Environment Agency and United Utilities. 		
MMC231	Seabridge Developments Limited		Mr Andy Williams (Advantage Land & Planning)		MM12 P.62 New para. between 7.50 and 7.51		No	No	No			<p>We consider the Plan makes inadequate housing provision for Biddulph, even for the first 10 years of the Plan and places an over-reliance on the delivery of most of Biddulph's requirement on just a couple of large strategic sites, at least one of which (Wharf Road) is significantly constrained and will not deliver the necessary new homes in a timely manner. Whilst we support the release of land at Gillow Heath from the Green Belt, we are therefore compelled to object to paragraph 6 of the Biddulph Area Strategy, which instead, should allocate sites BD062; BD068 and BD087.</p> <p>In any event, since the Plan is not proposing to fully meet the needs of Biddulph (924 dwellings) within the Plan period, the text "The intention is that it is set aside to meet future needs (rather than needs within the plan period like an allocation)" is confusing and should be amended to read "the first 10 years of the plan period".</p> <p>We consider that the text: "which proposes the</p>	The NPPF does not provide an absolute requirement to identify sites for the full plan period. The Council is committed to delivering the Wharf Road and Tunstall Road allocations through the Accelerated Housing Delivery programme and masterplans have been prepared in order to identify some of the challenges associated with the sites so the Council can address these issues in order to deliver the sites.	No change.

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												development so there is no guarantee that it will become an allocation. The land may not be needed in certain circumstances, for example - if the housing requirement for the District and/or spatial strategy changes in the future - but it provides a buffer to ensure that Green Belt boundaries around Biddulph have a degree of permanence" is unhelpful and unnecessary and should be deleted.	Each of the masterplans considered by the Council on the 8th October 2019 provide a strategic vision for the site, brings landowners together, provides next steps and assists in the delivery of the allocation. New site allocations have not been identified as being necessary during the examination process. Consider that the safeguarded land text provided is appropriate and that an amendment is not required.	
MMC233	Seabridge Developments Limited		Mr Andy Williams (Advance Land & Planning)		MM12 p.63 Policy SS6		No	No	No			We consider the Plan makes inadequate housing provision for Biddulph, even for the first 10 years of the Plan and places an over-reliance on the delivery of most of Biddulph's requirement on a couple of large strategic sites, at least one of which (Wharf Road) is significantly constrained and will not deliver the necessary new homes in a timely manner. Whilst we support the release of land at Gillow Heath from the Green Belt, we are therefore compelled to object to paragraph 6 of the Biddulph Area Strategy, which instead, should allocate sites BD062; BD068 and BD087.	See response to MMC231.	No change.
MMC109	Councillor (Biddulph West) Alistair McLoughlin				MM12 the		No	No	No	No	No	I notice that SMDC omitted part of your evidence base when you made decisions about these sites on 26th June 2019 at the Council Assembly. SMDC omitted the ecological evidence base and also incorrectly stated that these fields are urban / industrial land, which is incorrect. The decision to safeguard fields in Gillow Heath needs reconsidering both in light of your errors and in light of the evidence contained within the emerging Biddulph Neighbourhood Plan (Regulation 14 closing date 4th November 2019).	See standard officer response in MMC256.	See MMC256.

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												The SMDC Main Modifications are not Sound and do not Comply with the Duty to Cooperate. Sites BD062, BD068 and BD087, should remain as Green Belt land.		
MMC75	Mrs Kath Simmonds				MM15	No	No	No	No	No	No	Policy SD5 Flood Risk does not appear to have been applied when future safeguarding land has been identified at sites BD 068 & 087 as these sites are already on a known and recognised flood plain.with a natural watercourse running adjacent to them.	None of the sites are within Flood Zones 2 or 3 - they are adjacent. In their response to this consultation, the Environment Agency say that if the sites come forward for development at a later stage they would require a Level 2 Strategic Flood Risk Assessment because they are within close proximity of the floodplain and this may affect capacity and layout. However, they state that this would not be required for the land to be safeguarded.	To further emphasise that ecology, flooding and other relevant issues will be considered as part of any site allocation, it is suggested that if the Inspector considers it appropriate, an amendment to Policy SS6 could be made. For example, addition of wording such as "Any future development of the sites would require consideration of matters such as ecological surveys, layout, residential amenity and flood plain boundaries".
MMC77	Mr Trevor Simmonds				MM15	No	No	No	No	No	No	Policy SD5 Flood Risk does not appear to have been applied when future safeguarding land has been identified at sites BD 068 & 087 as these sites are already on a known and recognised flood plain.with a natural watercourse running adjacent to them.	Refer to MMC75.	Refer to MMC75.
MMC214	Miss Jane	Planning Specialist			MM15							We have no objection to the proposed changes to Policy SD15 Flood Risk as proposed under MM15, and support the	Comments noted. The policies of the emerging Local	No change.

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	Field	Environment Agency										<p>principles outlined within the changes to encourage natural flood risk management measures, and discourage the discharge of surface water into the public main sewer unless absolutely necessary.</p> <p>We would expect that should the above safeguarded sites would come through as planning applications prior to the local plan review, the requirements of this policy to be strictly adhered to in order to address the issues outlined above and to ensure that full assessment of how flooding may affect the site is undertaken, and appropriate mitigation in terms of site layout and mitigation be proposed.</p>	Plan remain material considerations in all planning applications prior to its adoption; alongside the application of policies in the adopted Core Strategy, and Section 14 NPPF 2018 etc.	
MMC465	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM15							<p>This policy on flood risk is of particular importance to Biddulph. It identifies that new development will be guided to areas at the lowest risk. The proposed additional three safe-guarded sites fail to respond to this policy, as they include partially areas of high and medium flood risk in each, as shown on Environment Agency mapping data. This can be seen on the enclosed maps.</p> <p>BD087 was highlighted by the Environment Agency previously in June 2016, when these sites were originally being considered before later being discounted. The Environment Agency made clear that inclusion of BD087 would require a level 2 assessment. This does not appear to be included in the additional evidence base for the main modifications. Given that MM39 and MM40 also have identified flood risk, the removal of any requirement for site-specific flood risks assessments in the main modifications is at odds with national policy and guidance.</p>	<p>Proportional evidence has been gathered for each site. In contrast to site allocations which need to be delivered within the plan period, a more long-term view of constraints for safeguarded land can be taken. Also, the same level of detailed information as would be needed for an allocation is not necessarily required when land is safeguarded as the position would be reviewed in the next plan and would include assessment of up to date evidence at that time including Environment Agency data before an allocation was made.</p> <p>In their response to this consultation, the Environment Agency say that if the sites come forward for</p>	No change.

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													development at a later stage they would require a Level 2 Strategic Flood Risk Assessment because they are within close proximity of the floodplain and this may affect capacity and layout. However, they state that this would not be required for the land to be safeguarded.	
MMC134	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM17	No	No	No	No	No	No	Object to deletion of land west of Basford Lane, Leekbrook and failure to find a replacement site is covered in detail in response to MM48.	See response to MM48.	No change.
MMC25	Mr Sean McBride	Persimmon Homes North West			MM20							<p>Persimmon is generally supportive of Policy H1 (2) which encourages self-build homes in accordance with para 61 of the NPPF however is concerned:</p> <ul style="list-style-type: none"> -that the Policy is ambiguous in not defining how many plots the Council will seek for self/custom build across the Plan period; - also the Council has not set out what demand for self/custom build has been identified; - not given full regard to the viability of providing such units; and - how they will be integrated into a wider residential scheme. <p>It is assumed unlikely that those wishing to self-build will seek opportunities within a general market housing estate and self-build on smaller and more modest plots.</p>	There has been a low level of interest in self build/custom build to date. The Council will continue to maintain and update the register of those interested. The policy states that where a demand exists a contribution towards this need would be in agreement with the council and negotiated on a case by case basis.	No change.
MMC26	Mr Sean McBride	Persimmon Homes North West			MM20							Whilst the company supports the Council's commitment to monitor the delivery of residential windfall sites and affordable housing to ensure that it is meeting expected levels, the Local Plan is not clear how it will seek to remedy any delivery issues that are identified.	The Local Plan states that 'if necessary the Council will review the Local Plan to bring forward additional sites for development'.	No change.

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MMC54	James Chadwick	Spatial Planning Policy Officer Staffordshire County Council			MM20							We have reviewed the Modifications and accept the proposed modifications where they relate to County Council functions. In particular we support the changes and additional text brought by MM20 in relation to housing an ageing population and provision for applying option space and accessibility standards. We will continue to work with you in delivery of the Plan and will be updating the Integrated Transport Strategy accordingly in due course.	Support for MM20 noted. SMDC will continue to involve SCC in all future Local Plan work.	No change
MMC135	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM20	No	No	No	No	No	No	Maintain objection to only allowing limited infill outside of smaller villages through the removal of village boundaries. Object to monitoring windfall site provision as it does not address non-delivery of windfall sites. There is a shortfall in provision across the plan period of 271 units.	Approach to infill reflects Inspector's post hearing advice which advocated monitoring delivery. The modifications make it clear that delivery would be a factor in triggering a plan review to improve housing delivery.	No change.
MMC164	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM20	No	No	No	No	No	No	Maintain objection to only allowing limited infill outside of smaller villages through the removal of village boundaries. Object to monitoring windfall site provision as it does not address non-delivery of windfall sites. There is a shortfall in provision across the plan period of 271 units.	Approach to infill reflects Inspector's post hearing advice which advocated monitoring delivery. The modifications make it clear that delivery would be a factor in triggering a plan review to improve housing delivery.	No change.
MMC27	Mr Sean McBride	Persimmon Homes North West			MM21							The Council will be aware that Persimmon has submitted a hybrid planning application seeking full planning consent for 125 homes and outline planning consent for up to 135 homes (total 260 homes) on land referred to as Cheadle North Strategic Development Area (CH001 and CH132). It is considered that the approximate capacity within Policy H2 be reflected to support realistic delivery assumptions and housing trajectory.	The Inspector has asked the council to update the land supply figures to 31 March 2019. Once the site has planning permission the updated position will be reflected in the following land supply update. It is acknowledged that the application is proposing fewer dwellings (-60) than the number	No change.

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													estimated within Policy DSC1 however there may be an opportunity to increase the numbers on the site during Phase 2 of the scheme. It should be noted that the Cecilly Mill site in Cheadle (part included within Policy DSC2) which is awaiting S106 agreement will deliver more housing (+76) than estimated.	
MMC32	Ms Hunter	Cheadle Town Council			MM21	No				No	No	<p>-The proposed housing level increase of 6000 dwellings for the Staffordshire Moorlands in the original Local Plan was already significantly higher than DCLG household projections of 2015. MM8 retains a very high figure of 6080 dwellings.</p> <p>-2016 ONS figures (Released late 2018) showed a further drop in the population growth projections for Staffordshire Moorlands. The level of housing proposed does not reflect the aspirations of the local community.</p> <p>-SMDC have presented the Planning Inspector with an 'Oxford Economics' model that significantly inflates the perceived level of housing need.</p> <p>MM21 details 1026 dwellings for Cheadle alone in less than 15 years. With an average occupancy of 2.4 residents this equates to a population increase of 2,462 residents against an existing population of 12,165 which is a 20% swell. This will bring minimal impact on the vitality of the town but maximum impact on the environment, traffic and infrastructure and is an unrealistic target.</p> <p>Most recent 2018 population projection figures also reflect a growth drop. ONS have consistently reduced population prediction figures since 2010 and none of this has been reflected in the Local Plan. Planned housing levels are excessive and will place unsustainable pressure on our infrastructure</p>	The Inspector's post hearing advice states that a housing OAN and requirement of 320 dwellings per annum (dpa) is justified and confirms that the overall requirement will still be 6080 dwellings.	No change.

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												and do not align with the aspirations of the local community.		
MMC35	Mr T A J Campbell		Mr John Wren	Director JMW Planning Limited	MM21	Yes	Yes	Yes	Yes	Yes	Yes	The allocation of land at Mobberley Farm (Policy DSC3) is both logical and long overdue.	Support noted.	No change.
MMC50	Mr & Mrs J. A. & C. Hamnett		Mr Kenneth Wainman	Director Ken Wainman Associates Ltd	MM21	Yes	Yes	Yes	Yes	Yes	Yes	Mr and Mrs Hamnett support the continued inclusion of the land at the corner of Brookfield Avenue/Stoney Lane, Endon (Policy DSR1).	Support noted.	No change.
MMC86	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	Mr Alan Corinal di-Knott	Knights 1759	MM21							<p>MM21 increases the housing density on the Tunstall Road allocation from 85 to 105. However, the masterplan, demonstrates that the deliverability of this site, due to viability and the need to agree land values and purchase with multiple land owners, is questionable in the short term. It is certainly not the case that this site will deliver housing in the next 5 years.</p> <p>The housing trajectory should be adjusted accordingly.</p> <p>The Local Plan will not demonstrate a 5 year supply. Further sites should be allocated e.g. site BE041 which would provide open market and affordable housing.</p>	<p>The Council is committed to delivering the Tunstall Road allocation through the Accelerated Housing Delivery programme and a masterplan has been prepared in order to identify some of the challenges associated with the site so the Council can address these issues in order to deliver the site. The masterplan report considered by the Council on the 8th October 2019 provides a strategic vision for the site, brings landowners together, provides next steps and assists in the delivery of the allocation. On this basis the figures included in the trajectory are considered realistic.</p> <p>It is considered that the 5 year land supply could be</p>	<p>If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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													amended to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. New site allocations have not been identified as being necessary during the examination process.	
MMC170	Mr Greg Powell	Cheadle Unite			MM21							<p>MM21 details 1026 dwellings for Cheadle alone in less than 15 years. With an average occupancy of 2.4 residents this equates to a population increase of 2,462 residents against an existing population of 12,165 which is a 20% swell. This will bring minimal impact on the vitality of the town but maximum impact on the environment, traffic and infrastructure and is an unrealistic target.</p> <p>Most recent 2018 population projection figures also reflect a growth drop. ONS have consistently reduced population prediction figures since 2010 and none of this has been</p>	The Inspector's post hearing advice states that a housing OAN and requirement of 320 dwellings per annum (dpa) is justified and confirms that the overall requirement will still be 6080 dwellings. The proportion of the total allocated to	No change.

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												reflected in the Local Plan. Planned housing levels are excessive and will place unsustainable pressure on our infrastructure and do not align with the aspirations of the local community.	each of the areas including Cheadle has not been modified.	
MMC190	St Modwen Homes	St Modwen Developments Limited	Mr Peter Hayward	Director Turley	MM21							<p>MM20 states under Policy H1 that higher housing densities will be generally appropriate in accessible locations. This would include locations such as at Blythe Vale. The Main Modifications (MM21) go on to specify under Policy H2 that the provision of 300 dwellings is the "indicative capacity" for Blythe Vale as a whole, and that 182 dwellings are the remainder of this indicative capacity following the approval of 118 dwellings at Phase 1 of Blythe Vale (App Ref. SMD/2017/0512).</p> <p>St Modwen Homes support the Main Modifications in considering appropriate housing density increases in accessible locations such as Blythe Vale. Consequently, appropriate housing density increases are sought at Blythe Vale, beyond the remaining 182 dwellings allocated, whilst at the same time ensuring that the quality of the proposed scheme is not adversely affected. A planning application to increase housing density at Blythe Vale from the approved 118 dwellings to a revised figure of 146 dwellings received a resolution to grant in April 2019 (App Ref. SMD/2018/0790). St Modwen Homes intend to continue this approach of increased housing densities across Blythe Vale as the remaining phases are brought forward. This will support the District's housing supply position and alleviate its historic housing shortfall in an accessible location, as sought through the Main Modifications to Policies SS3, H1 and H2.</p>	Comments noted. Planning applications will be assessed against all relevant policies in the Local Plan.	No change.
MMC281	Mrs Angela Turner				MM21		No	No	No	No	No	<p>- SMDC are omitting the ecological evidence base from decision making. Site allocations should be amended to take biodiversity into account.</p> <p>- Development densities have not been lowered to take known biodiversity into account throughout any of this local plan process. The evidence base is referred to inconsistently and not on a site-by-site basis. The decision to increase housing densities on Wharf Road (MM21) does not take the findings of the Phase 1 Ecological Surveys</p>	Refer to MMC256. Ecological evidence has been considered in reaching the housing densities proposed in the masterplan preferred options for Wharf Road and Tunstall Road.	See MMC256.

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												<p>into account.</p> <ul style="list-style-type: none"> - There is no evidence within the final selection of sites (for development sites and for safeguarded sites in the Biddulph area) that SMDC have taken the detailed ecological evidence base into account. There is no evidence that any reduction in density proposed on these sites has been agreed to reflect the biodiversity known to be present. No strategic effort has been applied to the local plan to ensure net gain for biodiversity and the environment. - BD071 & 71A / FID17 and BD076 / FID25&226: Wharf road development site 1.38ha of this land was identified as having a strong habitat mosaic of regional importance. In addition to this, mature trees and hedgerows need protection. There is no evidence in any of the Master-planning that this value has been taken into account. - BD117 / FID210: land west of the bypass and opposite Victoria Business Park Mature trees and hedgerows need protection and built into the design for the site. - Habitat mapping within the Biddulph area is lacking, SMDC local plan decisions are being made on an old evidence base and SMDC are failing in their duty to co-operate. - In order for the local plan to be sound, the Wharf Road Development needs to have regard to the biodiversity found within it. 		
MMC37	Mr T A J Campbell		Mr John Wren	Director JMW Planning Limited	MM22	Yes	No	No	No	No	Yes	<p>The level of affordable housing required in larger developments should not be arrived at by the Zoning system now introduced. Paragraph 64 of the NPPF sets a minimum figure of 10%. The target figure of 33% is too high particularly in relation to sites such as the Moberley Strategic Development Area where developers are going to be faced with a raft of other requirements which will collectively threaten the financial viability of the developments. The important feature of the allocated sites is that they must all be developed in the Plan period if the housing requirement for the District is to be met and so too many obstacles should not be placed in the way of that being achieved. Various infrastructure requirements must be met and</p>	<p>The Inspector requested that viability information relating to affordable housing in different parts of the district (Zones 1 to 4) was included in the supporting text. The Zones do not set the level of affordable housing. Policy H3 states that on sites of 10 dwellings (or 0.5ha) or more shall provide 33%</p>	No change.

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												that should take priority over a quota for affordable housing which in the case of Cheadle in particular is likely to be set too high by inclusion of the sites in Zone 3.	affordable housing. Where justified the Council will consider a lower level of provision taking into account the Local Plan and Site Allocations Viability Study, other up to date viability evidence and other contributions.	
MMC137	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM22	No	No	No	No	No	No	<p>Evidence indicates that 33% affordable housing is not viable on many allocations. The proposed modification provides flexibility but will cause uncertainty and delay as viability assessments will be required for each application. The trajectory should take this into account.</p> <p>The spatial strategy and site allocations should be reviewed in order to deliver additional affordable housing.</p> <p>Remove at the Council's discretion from Part 3 as it does not make it clear what would be acceptable.</p>	<p>The local plan is being examined under the 2012 framework which does not apply the same presumption from the 2018 NPPF that viability assessment should not normally be required at the application stage. The trajectory has been informed by research undertaken by Lichfield's on lead in times which was undertaken in the context of the 2012 NPPF approach to viability.</p> <p>See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land</p>	<p>If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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													supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. The spatial distribution of development is not subject to modifications. The Glossary of the NPPF (2012) defines Rural Exception Sites and states that small numbers of market homes may be required at the local authority's discretion	
MMC165	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM22	No	No	No	No	No	No	Evidence indicates that 33% affordable housing is not viable on many allocations. The proposed modification provides flexibility but will cause uncertainty and delay as viability assessments will be required for each application. The trajectory should take this into account. The spatial strategy and site allocations should be reviewed in order to deliver additional affordable housing. Remove at the Council's discretion from Part 3 as it does not make it clear what would be acceptable.	The local plan is being examined under the 2012 framework which does not apply the same presumption from the 2018 NPPF that viability assessment should not normally be required at the application stage. The trajectory has been informed by research undertaken by Lichfield's on lead in times which was	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure

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													<p>undertaken in the context of the 2012 NPPF approach to viability.</p> <p>See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. The spatial distribution of development is not subject to modifications. The Glossary of the NPPF (2012) defines Rural Exception Sites and states that small numbers of market homes may be</p>	<p>plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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													required at the local authority's discretion	
MMC185	Sean Lewis	West Midlands HARP Planning Consortium	Leonie Stoate	Assistant Planner Tetlow King Planning	MM22							<p>Would like to make the following comments:</p> <ul style="list-style-type: none"> - The updated definition for affordable housing is absent from the main modifications document. Local Plans should provide an up-to-date national definition for affordable housing in order to clarify which property types are classed as affordable. The national definition specified in Annex 2 of the NPPF does not refer to 'intermediate affordable' housing. - SHMA identifies high net annual need of affordable houses which is unrealistic to deliver when considering the effects of viability on housing development. Therefore all other efforts must be made by the Council to deliver as much affordable housing as reasonably possible within the District to ensure that delivery is striving to meet identified affordable housing need. - Pleased to see that the affordable housing thresholds have been revised to align with the PPG. However consider that a 'target' of 33% in paragraph 8.56 too openly invites developers to offer affordable housing at below this level. This should be consistent with the wording for Policy H3(1) and the word 'target' should be deleted. - Affordable housing mix in Policy H3(2) is too rigidly defined. Whilst 60:40 tenure split reflects the SHMA the affordable housing mix should also refer to the range of affordable housing types set out in Annex 2 of the NPPF which includes a wide range of affordable housing products. 	<ul style="list-style-type: none"> - The local plan is being examined under the 2012 Framework. - The Council recognises the significant need for affordable housing identified in the SHMA and the policies in the plan set out how affordable housing provision will be achieved. - Consider that the wording in para 8.56 could be amended to be consistent with the wording in the policy. 	If the Inspector considers it appropriate, the wording in para 8.56 could be amended to delete the word 'target'.
MMC191	St Modwen Homes	St Modwen Developments Limited	Mr Peter Hayward	Director Turley	MM22							Support the findings of the Viability Study and MM22 as it confirms Blythe Bridge and Forsbrook (Zone 1) to be the lowest value area in the District, within which Blythe Vale is located. The Main Modifications to Policy H3 go on to reiterate that the 33% affordable housing provision target is likely to be unviable at Blythe Vale, exacerbated further where developer contributions are sought to other areas (e.g. education). The Main Modifications therefore confirm that the Council will consider	The Inspector requested that viability information relating to affordable housing in different parts of the district (Zones 1 to 4) was included in the supporting text. The Zones do not set the level of	No change.

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												lower levels of affordable housing provision, where justified by further up-to-date viability evidence. St Modwen Homes support these findings and the associated Main Modifications. Development at Blythe Vale is already committed to provide developer contributions, including those relating to education. Consequently, St Modwen Homes consider the level of affordable housing provision at Blythe Vale to be a matter that will require testing as the development progresses to ensure overall deliverability. Clearly any obligations that are sought will further adversely impact this and ultimately render the scheme unviable and thereby affect its delivery.	affordable housing. Policy H3 states that on sites of 10 dwellings (or 0.5ha) or more shall provide 33% affordable housing. Where justified the Council will consider a lower level of provision taking into account the Local Plan and Site Allocations Viability Study, other up to date viability evidence and other contributions.	
MMC466	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM25							We support the modification to provide clarity on large-scale out-of-town developments. Biddulph Town Council is keen to ensure that the existing Town Centre remains viable and prospers in the longer term.	Comments noted.	No change.
MMC193	Kezia Taylerson	Historic England			MM27							We have no concerns regarding the amendments proposed and are supportive of the positive statements regarding heritage at risk. Policy DC2 – clause 6 relates to buildings at risk only and we would be supportive of a positive approach for heritage at risk generally which could include other heritage assets such as Registered Parks and Gardens or Scheduled Monuments etc.	Comments noted.	If the Inspector considers it appropriate, an amendment to Part 6 to reflect the inclusion of heritage at risk could be made.
MMC467	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM27							Biddulph Town Council strongly supports the 'Counting our Heritage' initiative, with Town Councillors actively participating in the project as volunteers. We would support SMDC to recruit volunteers for a future project and further raise awareness on our built heritage, including its economic value.	Comments noted.	No change.
MMC187	Mrs Susan Kneill-Boxley	Office and Publicity Manager CPRE Staffordshire			MM29			No	No			CPRE Staffordshire believe that it is inappropriate for 'Development proposals within a Local Green Space to be assessed against national Green Belt policy.' Reasons: a. The proposed policy attempts to apply	The Local Plan is being examined under the 2012 NPPF. Paragraph 78 of this document states that Local policy for managing development within	No change.

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												<p>national policy to a local designation. We do not think that this accords with government or Inspectorate advice.</p> <p>b. Green Belt policies should only be applied to areas of designated Green Belt - not to Local Green Space or other land outside Green Belt.</p> <p>c. Some villages and identified Local Green Space may be considered to be 'within Green Belt' by virtue of being surrounded by it but the village itself, and open space within it are not designated as Green Belt.</p> <p>d. Identified Local Green Space in a Local Plan may not necessarily be within Green Belt - but is still worth protecting on its own merits.</p> <p>Also in villages outside designated Green Belt we suspect that the proposed policy would be argued at appeal to be a nullity since as written in the modifications it tries to use National Policy on Green Belts to apply to land outside designated Green Belt.</p>	a Local Green Space should be consistent with policy for Green Belts . The Local Green Space policy wording has been modified to reflect this at the request of the Inspector.	
MMC468	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM29							<p>We have been unable to find the evidence to support the modification about 'most' of the Local Green Space. It is unclear why some were chosen, and others discounted at this stage. It has not been demonstrated that the requirements of national policy and guidance have been met.</p> <p>In amendments to policy DC4, we would suggest using similar wording to that in the emerging neighbourhood plan NE3 Local Green Space:</p> <p>"Local Green Spaces must remain as open space and their community value must be maintained or enhanced."</p> <p>This would then continue with the modification about being assessed against Green Belt policy. It should be noted that, whilst the protection for LGS is similar to that for green belts, the purpose is different.</p>	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete some of the Local Green Spaces (LGS) at the Council Assembly meeting on 26th June 2019. The wording to the policy was also amended at the Inspector's request.	No change.
MMC55	James	Spatial Planning			MM31							We have reviewed the Modifications and accept the proposed modifications where they	The proposed modifications to the	If the Inspector

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	Chadwick	Policy Officer Staffordshire County Council										relate to County Council functions. In relation to MM31 this addresses the concerns raised in our original consultation response dated 11 April 2018 around Education and delivery of school expansion projects. We will continue to work with you in delivery of the Plan and will be updating the Integrated Transport Strategy accordingly in due course.	supporting text were made to address earlier concerns raised by Staffordshire County Council (SCC) around Education and delivery of school expansion projects. Concerns have been raised by Sport England (see rep MMC177) regarding the new supporting text in that it is not consistent with Policy C2 or national guidance. It is considered that the supporting text could be modified in agreement with Sport England and SCC to satisfy these concerns.	considers it appropriate, revised supporting text wording can be drafted to satisfy all parties.
MMC177	Rajvir Bahey	Planning Manager Sport England			MM31				No	No		<p>Sport England supports the insertion of a new paragraph related to measures to securing replacement playing field provision, which is consistent with National Planning Policy Framework paragraph 97 and Sport England's Playing Fields Policy Exception E4 https://www.sportengland.org/media/12940/financial-playing-fields-policy-and-guidance-document.pdf.</p> <p>However, the addition of new paragraph 8.105 is not supported as it is not consistent with the policy related to the protection of open space, recreational land and buildings including playing fields and amenity open space from development, as set out within Policy C2 and NPPF paragraph 97. The approach is also not consistent with Sport England Playing Fields Policy and Guidance.</p> <p>The provision for an off site financial contribution in circumstance where replacement playing field is not reasonable practicable is not one of the exceptions contained within Policy C2 and NPPF paragraph 97 (and Sport England's Playing</p>	The proposed modifications to the supporting text were made to address earlier concerns raised by Staffordshire County Council (SCC) (see in the original consultation response dated 11 April 2018) around Education and delivery of school expansion projects. SCC have supported these modifications (see response MMC55). Concerns raised by Sport England regarding the new supporting text in that it is not consistent with Policy C2 or	If the Inspector considers it appropriate, revised supporting text wording can be drafted to satisfy all parties.

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												<p>Fields Policy and Guidance). It is also unclear as to the circumstances when it is deemed "not practicable" to make like for like replacement playing field provision. Therefore inconsistencies could arise as to when replacement provision is provided or not thus the policy is not deemed to effectively ensure the protection of playing field land.</p> <p>It should be noted that the Playing Pitch Strategy provides an identification of pitch markings on a playing field at a point in time. A playing pitch could be marked out on a larger playing field area capable of accommodating alternative pitch markings to meet curricular and community use demand. Therefore the supporting text of Policy C2 should not solely focus on the potential loss of a playing pitch but on the impact on the playing field as a whole.</p>	national guidance are noted. It is considered that the supporting text could be modified in agreement with Sport England and SCC to satisfy these concerns.	
MMC469	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM31							We support the requirement for additional provision of playing pitches. Biddulph Town Council is keen to ensure access for all to suitable sports and playing pitches.	Support noted.	No change.
MMC194	Kezia Taylerson	Historic England			MM34							Welcome a sentence that includes reference to heritage policies in this list, alongside other environmental considerations such as biodiversity and flooding and in line with other statutory agency considerations.	Comments noted.	If the Inspector considers it appropriate, an additional bullet point could be added to include heritage policy.
MMC195	Kezia Taylerson	Historic England			MM35							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not</p>	Comments noted. Following the Inspector's advice to make the site specific policies more bespoke, where there are particular heritage issues identified in the Council's Landscape, Local Green Space and Heritage Impact Study. e.g. Policy DSB1, specific wording has been included detailing	No change.

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												<p>be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>	<p>these. Where no particular issues have been raised in relation to a site, policy wording is not included. Reference to the Council's study is contained within the supporting text to the relevant site policies so prospective developers are aware of its existence.</p>	
MMC196	Kezia Taylerson	Historic England			MM36							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is</p>	<p>see response to MMC195</p>	<p>No change.</p>

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												<p>no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>		
MMC47 2	Mr John Pigott				MM36							<p>The inspector recommended 'Recognition of the recreational value of the Mount to the community and reflect this in master planning proposals through the sensitive treatment of Mount Road and Kniveden Lane, appropriately located green infrastructure, recognition of key views and connectivity to public rights of way.'</p> <p>To me the only way to provide more green infrastructure and recognise the importance of the key views is to reduce the number of houses being crammed into the sites by 10 perhaps 20%.</p> <p>So instead of modifying the HIS document the planners have chosen to still continue with the draft document dated November 2018 showing a total of 345 dwellings instead of reducing the numbers to take account of the Inspectors comments.</p> <p>It is very poor that you can ignore the Inspector's comments and just insert a paragraph that has no substance.</p>	The modification reflects the Inspector's post hearing advice which did not require a reduction in the number of homes planned off Mount Road.	No change

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MMC48 2		Ollerton Estate LLP	Chris Sinton		MM36							<p>Ollerton Estate broadly supports the suggested changes and considers that the Local Plan meets the tests of soundness set out in the National Planning Policy Framework (NPPF). In relation to MM36:</p> <ul style="list-style-type: none"> - no concerns regarding the need for a masterplan - clarification is sought on the policy wording - Mount Road has a speed limit of 60mph and is not a Local Green Space. It is recognised that the road is used informally by the community. The policy should be amended to refer to informal recreational value to be consistent with supporting text. Para. 9.11 intimates that the development of the Mount would restrict pedestrians and cyclists using the area, which is not the case. The text should be amended to reflect this (see original representation for wording). - Other modifications relating to the site are acceptable e.g. noise assessments, landscape, highways requirements. 	Clarification to policy could be acceptable, subject to consideration of the Inspector.	No change.
MMC19 7	Kezia Taylerson	Historic England			MM37							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p>	see response to MMC195	No change.

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												-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.		
MMC198	Kezia Taylerson	Historic England			MM38							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not</p>	see response to MMC195	No change.

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												be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.		
MMC8	Mr Jim Davies				MM39		No	No			No	Concerned that the development plan for Wharf Road shows a retail park at the southern end of the site. This is in conflict with other areas of the Local Plan. SS6 states that town centre regeneration will be supported, development away from the town centre will not comply with this. MM 39 9.33 states that the new store should be sustainably located so that 'linked trips to the town can be achieved'. In the position proposed this cannot be achieved. The proximity of listed buildings also makes the proposed position non-compliant. The proposed retail development should be at the north end of the site, a sustainable position near the town centre, away from listed buildings and offers the possibility of linked shopping trips. This would make the development Local Plan compliant.	MM39 shows the amended policy wording and supporting text for the Wharf Road Strategic Development Area. It refers to the increased number of houses which can be accommodated on the site as a result of detailed masterplan work. The layout and position of individual uses e.g. retail is not covered in the Local Plan. This is covered in the masterplan, a separate document. A planning approval will be needed for the development to go ahead so any scheme would need to be in line with the Local Plan and national planning policy. The masterplan was reported to Service Delivery Overview	No change.

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													& Scrutiny Panel on the 25th September 2019.	
MMC139	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM39	No	No	No	No	No	No	<p>The reduced site area will see a reduction in housing of 146 units.</p> <p>There should be an increase in units and identification to address the shortfall.</p>	Housing densities are proposed to be increased at the remainder of Wharf Road and Tunstall Road to address part of the deficit arising from the reduction in the site area. It is acknowledged that a deficit remains when measured against the full plan period.	No change.
MMC166	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM39	No	No	No	No	No	No	<p>The reduced site area will see a reduction in housing of 146 units. There should be an increase in units and identification to address the shortfall.</p> <p>There is suitable, deliverable land available in Biddulph Moor which accords with the Council's evidence on Green Belt, landscape and delivery.</p> <p>Council should amend spatial strategy to reflect viability and constraints. The Council is required to adopt the most appropriate strategy.</p>	<p>Housing densities are proposed to be increased at the remainder of Wharf Road and Tunstall Road to address part of the deficit arising from the reduction in the site area. It is acknowledged that a deficit remains when measured against the full plan period.</p> <p>Reasonable alternatives for the spatial strategy have been considered during the preparation of the local plan. This led to a reduced percentage of housing being allocated to the Rural Areas in comparison with the Core Strategy to reflect constraints, including Green Belt.</p>	No change.
MMC19	Kezia	Historic			MM39							Comments relate to all site specific policies	see response	No change.

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9	Taylorson	England										<p>where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>	MMC195	
MMC471	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM39							- The lack of meaningful and informative consultation with the wider community is problematic and at best poor practice. There was also a lack of liaison with Biddulph Town Council as a statutory planning body.	Biddulph Town Council and the wider community have been given the opportunity to	No change.

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												- The emerging Biddulph Neighbourhood Plan seeks to reduce car journeys and encourage people to use traffic free routes. The suggested removal of the intention to encourage developer contributions to cycle and improved pedestrian routes is clearly unsustainable. Development of this site should include making positive links to the town centre and wider residential areas, to reduce the need to travel by car.	comment on the main modifications at this stage. The text relating to contributions to cycle and improved pedestrian routes has been removed from Policy DSB1 as it is covered in other policies and the Inspector feels that generic references are unnecessary. MM34 covers this point.	
MMC560	Mr Graeme Court				MM39							Refer to MMC540 summary.	Refer to the officer response to MMC8.	No change.
MMC470	Ms Sarah Haydon	Chief Officer Biddulph Town Council			MM39							- The Wharf Road Strategic Development Area Concept Masterplan is deeply flawed. Fails to provide a clear framework for sustainable development and to respond to the constraints and opportunities of the area. The transition from allocating land for retail and then housing requires an evidence base and no consideration has been given to the impact of potential commercial uses in proximity to residential development. How would this meet the requirements of Policy MM25? Lack of meaningful and informative consultation with the wider community and Biddulph Town Council. - Do not support the removal of the text to paragraph 9.36. This seeks to inform future design and highlight the landscape sensitivities. - Paragraph 9.43 should make reference to the wildlife and habitat mapping 2018, prepared for the emerging neighbourhood plan. - Policy DSB1 identifies a singular large mature tree to be retained. SMDC should place a tree preservation order on the tree to ensure it is retained and suitably protected.	- The principle of development on this site has been accepted including the mix of uses. The main modifications consultation simply addresses detailed amendments to the policy. It refers to the increased number of houses which can be accommodated on the site as a result of masterplan work. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document which was consulted upon separately from the Local Plan. In any case before the site	No change.

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												<p>- Environmental Health has advised that careful design is required to reduce the impact of air quality of the by-pass on occupiers of the new dwellings. We are therefore confused by the removal of the following text: "positioning of housing away from the immediate edge to prevent noise and air quality issues". This would be contrary to the advice of Environmental Health and to national policy and guidance.</p>	<p>could be developed it would need planning permission and the Town Council would then have the opportunity to raise any concerns they have about the detailed layout of the scheme.</p> <p>- The text in paragraph 9.36 has been removed as it relates to BDNEW which has also been removed.</p> <p>- It is acknowledged that the Town Council has undertaken recent ecology work. However, as there appears to be no accompanying narrative to the maps it is not clear how the evidence could be applied.</p> <p>- Comments in relation to the tree are noted.</p> <p>- The text relating to air quality has been removed from this policy as it is covered in other policies and the Inspector feels that generic references are unnecessary. MM34 covers this point.</p>	
MMC54 Q	Mrs Janet Court				MM39							Re-orientating the plans for Wharf Rd [now housing preferred] instead of formerly proposed retail/business and making the old Meadows site available for retail [not] housing, will be detrimental to the already struggling businesses in the High St, by dragging footfall	Refer to the officer response to MMC8.	No change.

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												and trade to the top of the Biddulph Inner Ring Road.		
MMC7	Mr Jim Davies				MM41						No	Concerned that the development plan for site BD117 has been produced without due concern for the residents of Victoria Row and therefore does not satisfy the requirement of 'duty to co-operate'. The development plan shows industrial buildings opposite Victoria Row. No residents want this or requested it in the consultation about the site development. A more acceptable arrangement would be for the houses proposed in Mill Hayes Road to be placed opposite Victoria Row and the industrial development extended to Mill Hayes Road.	MM41 shows the amended policy wording and supporting text for the Tunstall Road Strategic Development Area. It refers to the increased number of houses which can be accommodated on the site as a result of detailed masterplan work and states that layout details (e.g. position of access, housing and employment uses) will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document and was reported to Service Delivery Overview & Scrutiny Panel on the 25th September 2019. In any case before the site could be developed it would need planning permission and residents would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which	No change.

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													could differ from the masterplan.	
MMC200	Kezia Taylerson	Historic England			MM41							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>	see response to MMC195	No change.
MMC31	Mr				MM41							Object to BD117 allocation. The reason we	The principle of	No change.

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1	John Sproston											<p>purchased this property was because of it's location. We are appalled at the plans to build both industrial and residential properties around us. We would be completely surrounded by developments mainly industrial, We have a petrol station on one side and industrial on the other already. These plans would encase us with industrial at the front as well. At no point we're we consulted regarding these plans. I was in formed by a friend who lives in Farnham of the planned consultation at the Knypersley Cricket Club. He received a flyer notifying him of this. Why were the residents of Victoria Row not given a flyer? All I have spoken to including myself have not received any notices. I find Staffordshire Moorlands District Councils willingness to simply take land out of green belt to build on a absolute disgrace. This coupled with the lack of information given is a disgraceful display in my opinion.</p>	<p>development on this site has been accepted. The main modifications consultation simply addresses detailed amendments to the policy. It refers to the increased number of houses which can be accommodated on the site as a result of masterplan work and states that layout details (e.g. position of access, housing and employment uses) will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document which was consulted upon separately from the Local Plan. In any case before the site could be developed it would need planning permission and residents would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan.</p>	
MMC340	Mr Michael				MM41							<p>Object to BD117 allocation for the following reasons:</p>	<p>The principle of development on this site has been</p>	No change.

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	Jackson											<ul style="list-style-type: none"> - Impact on wildlife. - Highway safety. - Impact on residential amenity. - Inadequate consultation on masterplan process. Residents on Victoria Row were not invited to a consultation event. 	<p>accepted. The main modifications consultation simply addresses detailed amendments to the policy. It refers to the increased number of houses which can be accommodated on the site as a result of masterplan work and states that layout details (e.g. position of access, housing and employment uses) will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document which was consulted upon separately from the Local Plan. In any case before the site could be developed it would need planning permission and residents would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan.</p>	
MMC32 Q	Ms Carole Moors				MM41							<ul style="list-style-type: none"> - The site is an area of importance ecologically - home to many and varied species of plants and animals. - The access to the site would be from the 	<p>The principle of development on this site has been accepted. The main modifications</p>	No change.

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												<p>A527. This road is already busy at all times.</p> <p>- Would have a serious affect upon the value of the property in the surrounding area.</p>	<p>consultation simply addresses detailed amendments to the policy. It refers to the increased number of houses which can be accommodated on the site as a result of masterplan work and states that layout details (e.g. position of access, housing and employment uses) will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document which was consulted upon separately from the Local Plan. In any case before the site could be developed it would need planning permission and residents would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan.</p>	
MMC346	Mr Steve Parker				MM41							<p>Oppose development at Victoria Row due to:</p> <p>Government housing policy is forcing councils to meet aggressive house building targets. This directly causes new developments on Greenbelt & Greenfield. Many councils believe the targets are unrealistic. According to CPRE</p>	<p>The principle of development on this site has been accepted. The main modifications consultation simply addresses detailed</p>	No change.

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												<p>460,000 homes are currently planned for greenbelt & greenfield sites.</p> <p>Loss of greenbelt & greenfield sites for housing negatively affects the environment, releasing carbon from the land & losing that land's ability to capture new carbon. Wildlife and plant life already under stress, are displaced & loss of green spaces has a negative effect on communities. Our green and pleasant land will soon be no more.</p>	<p>amendments to the policy. It refers to the increased number of houses which can be accommodated on the site as a result of masterplan work and states that layout details (e.g. position of access, housing and employment uses) will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document which was consulted upon separately from the Local Plan. In any case before the site could be developed it would need planning permission and residents would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan.</p>	
MMC355	Ms Julie Jackson				MM41							<p>I would like to register my disapproval of the development of the greenbelt land bordering Victoria Row, Tunstall Road and Mill Hayes Farm due to:</p> <ul style="list-style-type: none"> - Land is a valuable site for wildlife - Land serves as a natural boundary between Staffordshire Moorlands and Stoke-on-Trent 	<p>The principle of development on this site has been accepted. The main modifications consultation simply addresses detailed amendments to the policy. It refers to</p>	No change.

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												<p>districts.</p> <ul style="list-style-type: none"> - The trees themselves are also very established and are essential to the wildlife should also be preserved. - Properties in Victoria Row would literally be surrounded by industry on all sides. - There are much more suitable areas of land which would have far less impact and with better access than this site. - Impact on highway safety. 	<p>the increased number of houses which can be accommodated on the site as a result of masterplan work and states that layout details (e.g. position of access, housing and employment uses) will be determined as part of the masterplan taking into account amenity impacts in relation to neighbouring land uses. Consequently the Local Plan allocation does not cover the detailed layout of the site. The masterplan is a separate document which was consulted upon separately from the Local Plan. In any case before the site could be developed it would need planning permission and residents would then have the opportunity to raise any concerns they have about the detailed layout of the scheme which could differ from the masterplan.</p>	
MMC585	Mr Graeme Court				MM41							Refer to MMC540 summary.	Refer to officer response to MMC7.	No change.
MMC475	Mrs Jane Neumann				MM41	Yes	Yes	Yes	Yes	Yes	Yes	<p>Support release of Green Belt land to north of Biddulph for the following reasons:</p> <ul style="list-style-type: none"> - Core Strategy acknowledges that Green Belt release in Biddulph is necessary to support 	<p>Support for safeguarded land in Biddulph noted. Future housing development would</p>	No change.

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												<p>growth.</p> <ul style="list-style-type: none"> - Family wishes to buy new housing in Biddulph - The land to the north of Biddulph sustainable - is close to existing housing, better facilities in north Biddulph, closer to Congleton train station, close to Biddulph Valley Way, education e.g. Woodhouse Academy and bus service - Close access to Biddulph Valley Way provides healthy access to recreation and commercial areas - Good access to urban drainage systems in north of Biddulph. <p>Policy SS6 strengthens links between town and countryside in particular Biddulph Valley way and Biddulph Grange Garden and Country Parks - this should also include housing to address Biddulph's and national housing needs.</p>	be dependant on consideration of the land as a housing allocation in a future Local Plan review.	
MMC58 1	Mrs Janet Court				MM41							Proposed Mill Hayes/Victoria Rd site..a mix of residential and business premises is acceptable. [But] please do not develop in such a way [that] [existing residents] of Victoria Row to [overlook] industrial units..Would be unfair in terms of..light, noise and pollution from businesses/their traffic. Better that residential [element] are built on their boundaries.	Refer to officer response to MMC7.	No change.
MMC28	Mr Sean McBride	Persimmon Homes North West			MM42							<p>Generally supportive of MM42 and Policy DSC1 however recommends that the policy is updated to reflect the up to date situation regarding the current planning application. It is considered that:</p> <ul style="list-style-type: none"> - the policy should be revised to 'at least 260 homes' to reflect revisions to the proposed illustrative masterplan as a result of comments from statutory consultees which would ensure an element of flexibility for future planning applications. - the second bullet point concerning the provision of land and access to the School Site be revised to 'Provision of land and appropriate access for a new County Primary School. Provision of the School Site will be 	Policy DSC1 sets out the strategic policy for the Cheadle North Strategic Development Area and includes approximate dwelling numbers and approximate land take for the new school and playing fields. It is acknowledged that the application is proposing fewer dwellings (-60) than the number	No change.

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												<p>secured via s106 agreement and timescale for its delivery agreed with the Education Authority'.</p> <p>- through the determination of the planning application it has been advised that the Council are now seeking 1ha rather than 2ha to accommodate a new County Primary School with associated school playing fields. Consider that this should be reflected within Policy DSC1.</p> <p>- the requirement for 'provision of two separate access points' is overly prescriptive and not supported by information contained within the Local Plan evidence base. Recommend a revision to this main modification to 'Provision of a suitable point(s) of access, supported by a detailed Transport Assessment'.</p>	<p>estimated within Policy DSC1 however there may be an opportunity to increase the numbers on the site during Phase 2 of the scheme. It should be noted that the Cecilly Mill site in Cheadle (part included within Policy DSC2) which is awaiting S106 agreement will deliver more housing (+76) than estimated. Once the site has planning permission the updated position will be reflected in the following land supply update. Details regarding the school site and access arrangements should be determined at the planning application stage and in conjunction with the Education Authority and the Highways Authority. The Highways Authority has always required the need for two access points (see site proforma for the site - examination doc 13.3 – Site Allocations Topic Paper Cheadle). The current application for the site (SMD/2018/0180) proposes three access points.</p>	
MMC201	Kezia	Historic England			MM42							Comments relate to all site specific policies where there is reference to heritage mitigation	see response to MMC195.	No change.

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	Taylorson											<p>and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>		
MMC202	Kezia Taylorson	Historic England			MM43							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external</p>	see response to MMC195	No change.

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												<p>evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>		
MMC38	Mr T A J Campbell		Mr John Wren	Director JMW Planning Limited	MM44	Yes	No	No	No	No	Yes	The approach to releases of green belt at the southern end of Cheadle is not consistent with paragraph 139(f) of the NPPF which requires the clear definition of boundaries using physical features that are readily recognisable and likely to be permanent. Given the importance of the Mobberley area to meeting the housing requirement and the lack of importance of the land to the west and south of the allocation in meeting green belt	The Inspector has not indicated that any further Green Belt release is required.	No change.

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												objectives, the approach in the submitted Plan and these Modifications of only taking the vet's land out of the green belt is too restrictive. The watercourses to the west and south of the allocation would be more appropriate boundaries. The exceptional circumstances required by paragraph 136 of the NPPF are outlined in the remainder of the policy particularly the need for the masterplan to address screening of the southern edge of the development area. Take more land out of the green belt so that the southern and western boundaries of the Strategic Development site are the two watercourses. Delete reference to the vet's land as being the only land that is to be removed from the green belt. The approach should be to do not the minimum but what is best in the long term for this area.		
MMC203	Kezia Taylerson	Historic England			MM44							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that</p>	see response to MMC195.	No change.

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												assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.		
MMC204	Kezia Taylerson	Historic England			MM45							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a</p>	see response to MMC195.	No change.

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												result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.		
MMC70	Mr and Mrs Trevor and Doreen Brough				MM46							<p>We feel that a monitoring review to the local plan every 5 years should be inline with the NPPF. In Blythe Bridge currently, the plan leans towards increasing the size of the St Modwen's development site at Blythe Vale. I feel due to the size of this development it limits potential for other planning opportunities in the Blythe Bridge area.</p> <p>We also feel that within our current climate for reducing Carbon footprint and the effects it has on the environment. All plans should be accountable for the potential impact it has. Previously overlooked greenbelt sites should be revisited due to having more accessible transport links such as railway stations therefore lowering the impact they have on the environment. The current development at Blythe Vale will certainly lead to more traffic congestion unless major redevelopment of surrounding highways is planned. The new volume of traffic will come from new home owners from the development.</p> <p>We feel that it is therefore vital a five-year supply is maintained by the Council. This could be done with regular contact with landowners and developers so that potential sites with better local amenities and transport links are at the forefront of any future local plans.</p>	<p>The Council will in future undertake Local Plan reviews in line with expectations of NPPF. The Local Plan upon adoption will provide a 5 year supply of housing.</p> <p>Note the rest of this representation raises issues previously discussed at the examination and does not pertain to any of the published Main Modifications.</p>	No change.
MMC52	Mr David Pyner	Asset Manager Highways England			MM46							<p>HE are committed to supporting Government objectives on economic growth and sustainable transport and recognises need for closer transport and planning integration [DfT Circ 02/2013].</p> <p>The SRN running through SMD is A50 between Blythe Bridge-Uttoxeter. In [earlier] Feb 2019 HE response we highlighted a lack of detailed analysis of potential trip generation of the revised housing and its potential traffic</p>	<p>Comments noted. Thank you for clarifying HE support for modified DSR1 now requiring comprehensive masterplan with phasing programme. SMDC will continue to involve HE in all</p>	No change

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												<p>impact on the SRN and prioritisation of more detailed traffic assessment of A50/A521 junction in relation to Blythe Vale. We recommended detailed transport analysis and assessment be carried out by individual site promoters of their sites [either through planmaking process or planning application process]. Regarding the MMs, we note change in Plan period [now 2014 -2033] : net housing requirement decreased from 3859 to 3802 ; Pol SS4 employment allocation increased from 27ha to 32ha. These revisions will need to be taken into account in transport analyses.</p> <p>Proposed amendments to Pol DSR1 include the provision of a comprehensive masterplan with indicative phasing programme. The phased delivery will need to be reflected in the forthcoming transport analysis. We welcome stated requirement for drafting of TA in support of Blythe Vale development and welcome engagement with site owner [regarding] site impacts on A50. The MMs do not alter the essence of our previous comments.</p>	future Local Plan work.	
MMC205	Kezia Taylerson	Historic England			MM46							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a</p>	See response to MMC195.	No change.

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												'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.		
MMC188	St Modwen Homes	St Modwen Developments Limited	Mr Peter Hayward	Director Turley	MM46							Support the allocation of Blythe Vale. Also support MM46 for the development to comply with a comprehensive masterplan and indicative phasing programme.	Support noted.	No change.
MMC206	Kezia Taylerson	Historic England			MM47							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as</p>	see response to MMC195.	No change.

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												<p>policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>		
MMC217	Miss Jane Field	Planning Specialist Environment Agency			MM47							<p>We note that through modification MM47 relating to Policy DSR2 Land east of Brooklands Way, Leekbrook the specific flood risk requirements have been removed with reference instead to wider planning policies (specifically in this case SD15 Flood Risk). We have no objections to this in principle, however recommend that some reference to how flood mapping does affect the site would be useful to highlight this issue at an early stage for potential developers as it will likely involve substantial work to address. The site EM2 (assumed to relate to this policy) as shown on the Leekbrook map includes outlines from our indicative JFLOW modelling partially across the northern boundary of the site. This indicative modelling is partially modified and as such reduced by the replacement of the JFLOW extents with information from our 2014 Hazard Mapping Study, and as part of any planning application we would expect this more detailed modelling to be extended across the length of the site to fully inform on how flooding may affect proposals.</p>	<p>Comments noted. Note that following discussions at the examination hearings, and to ensure consistency across all Development Site Policies, site-specific flood risk policy requirements etc were removed and replaced with signposting to general development management policies.</p>	No change.
MMC140	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM48	No	No	No	No	No	No	<p>The employment allocation at Land west of Basford Lane has been deleted which results in a shortfall of c. 0.8ha. this should be addressed.</p>	<p>Site removed following Inspector's advice. Shortfall can be met through</p>	No change.

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												Our client's site is an existing employment allocation (Land off Wardle Gardens, Leekbrook) and was recently refused permission for residential as it would jeopardise employment coming forward.	windfall provision.	
MMC207	Kezia Taylerson	Historic England			MM48							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally</p>	See response to MMC195.	No change.

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												so that prospective developers are aware of its existence.		
MMC2	Mrs Sandra Maskery				MM49	Yes	Yes	Yes	Yes	Yes	Yes	Considers the plan is sound, legally compliant and complies with the duty to co-operate.	Support noted.	No change.
MMC11	Rob Sanderson (Homes England)	Senior Planning Manager – Land Homes England			MM49	Yes	Yes	Yes	Yes	Yes	Yes	<p>Homes England supports the proposed changes to Policy DSR4 and its supporting text set out in MM49, as well as the associated amendments to the Development Boundary adjacent to the sites, shown on Werrington Map A4.11, (i.e., MM64).</p> <p>The proposed additional supporting text helpfully sets out the exceptional circumstances that exist to justify the release of the sites from the Green Belt and the relatively small impact that development of the site would have on the purposes of the Green Belt.</p> <p>The minor amendments to the Development Boundary (and extension of the proposed housing allocations) will ensure that satisfactory highway access to both sites can be achieved and will help to ensure the future delivery of the sites, thereby assisting the LPA in maintaining a 5 year housing land supply.</p> <p>Note that references to the sizes of the sites in paragraphs 9.119 and 9.123 should also be changed, to reflect the proposed wording of Policy DSR4.</p>	Comments noted. Paragraphs 9.119 and 9.123 could be amended to refer to the amended WE003 and WE052 sites areas as set out in modified Pol DSR4.	If considered necessary by the Inspector, amend paragraphs 9.119 and 9.123 to refer to the amended WE003 and WE052 sites areas as set out in modified Policy DSR4.
MMC208	Kezia Taylerson	Historic England			MM49							<p>Comments relate to all site specific policies where there is reference to heritage mitigation and the Council's Landscape, Local Green Space and Heritage Impact Study.</p> <p>-Recognise that linking to an external evidence base to highlight appropriate mitigation measures may not be considered appropriate in this context, as highlighted by the proposed main modifications from the Planning Inspector. However, there are site specific policies within this list that still do relate to these studies above, which may be an error or there may be a particular reason why. We are concerned that by not linking to the external evidence base study that some appropriate mitigation measures may now not be referenced and that only some mitigation</p>	See response to MMC195	No change.

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												<p>measures are now specifically cited.</p> <p>We would recommend that if this reference is no longer to be contained that there is a considered analysis of the heritage impact study for these sites and any required mitigation measures are now included as policy text within the Plan.</p> <p>-Lack of detail on what might constitute a 'mitigation of heritage impact' and we would be concerned that the level of detail accompanying planning applications will not be appropriate. Recommend the insertion of a paragraph that states that planning applications should be accompanied by a statement of significance (or similar) that assesses the significance of any heritage assets potentially affected by proposed development, including their setting and an impact assessment of the level of harm as a result of the proposed development, which should include avoidance, mitigation or enhancement measures, in proportionate detail to the asset's significance and by an appropriate qualified professional where relevant or some similar wording that sets out detail of what would be expected and a link to the Council's heritage impact study generally so that prospective developers are aware of its existence.</p>		
MMC479	David Nixon				MM49							<p>The plan is unsound as it unlikely to provide enough housing for the 5 year land supply. There is a need for more housing for the aging population and to reflect the increased employment land requirement.</p> <p>MM49 recognises that housing delivery will be difficult with a green belt review. However, the only commitment to review this is for Biddulph which is arguably the least representative of all the settlements due to its close relationship with the Newcastle/ Stoke on Trent conurbation.</p> <p>Sites elsewhere in Larger Villages such as Forsbrook should be included to support affordable housing needs.</p> <p>There should be a link to policy DC3 where the support for sympathetic and enhancing development is largely meaningless without a willingness to review settlement edges.</p>	<p>The whole green belt has been reviewed with release now proposed in Biddulph and Werrington. Exceptional circumstances have not been justified in other Larger Villages. The objectively assessed need for housing is being met with the currently proposed level of green belt release.</p> <p>If deemed necessary by the</p>	No change.

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													Inspector, a cross reference between Policy H1 and DC3 could help to clarify the relationship between the two policies in respect of development on the edge of settlements.	
MMC487	Mr Paul Dean				MM49	No	No	No	No	No	No	Object to the removal of sites WE003 and WE0052 out of the greenbelt. The sites provide a buffer zone around the young offenders institute. There will be anti social behaviour problems. Alternative sites are available.	The modification relates to the detail of the landscaping and access rather than the principle of the sites being released from the green belt and developed for housing. Supporting information for the allocation is provided in the Rural Areas Site Allocations Topic Paper (ED. 13.4).	No change
MMC56	Mr Jack Robinson	Lead Catchment Planner (Staffs & Derbs) Severn Trent Water			MM50							We are aware that this site has been given some consideration for numerous years and was highlighted in the Churnet Valley Supplementary Planning Document back in 2014. There has always been considerable uncertainty whether the site could progress due to numerous constraints. Due to the scale of the aspirations for this site we would like to highlight that the local waste water treatment works would likely become overloaded and may need considerable investment in order to accommodate proposals without causing a harmful environment impact. We would welcome any collaborative strategic discussions on progression of this site so that we can understand; the detailed nature of the development, the likelihood that it will progress, the anticipated build profile (timeline) and what this may mean to us in terms of infrastructure investment. Please keep us informed when your plans are further developed when we will be able to offer	Comments noted. DSR5 and its supporting text do not identify Bolton Copperworks in the housing allocations policy, nor do the Council make any provision for it in our housing trajectory. This is due to extent of constraints on the site which do not indicate that it would be a reliable source of housing supply. However the Policy allows for a range of uses, subject to the constraints identified in the Policy being overcome, and subject to	No change.

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												<p>more detailed comments and advice.</p> <p>[Position Statement and standard STW advice on 'Sewage Strategy'/ 'Surface Water and Sewer Flooding'/'Water Quality' /'Water Supply'/'Water Efficiency' also provided].</p>	<p>conformity with wider policies and the Churnet Valley Masterplan. With regards waste water issues, development proposals would have to comply with the requirements of Policies SS12, SD4 and SD5 (as modified).</p> <p>The Council will continue to involve STW in all future stages of Local Plan preparation. Water companies remain a statutory consultee on most planning applications.</p>	
MMC218	Miss Jane Field	Planning Specialist Environment Agency			MM50							<p>- Note the addition of Policy DSR5 under MM50 which relates to Bolton Copperworks at Froghall, and removal of some associated text from Policy SS10 as detailed under MM13.</p> <p>-Note that through this policy the site is identified as an 'opportunity site' as it is referenced within the associated Churnet Valley SPD. Welcome the acknowledgement of the significant flood risk and contaminated land issues that affect this land. It should be clarified however, that if this policy in any way allocates this land for development by establishing the principle of redevelopment, significantly more work will be required to support such an allocation at this stage in order that it meets flood risk policy outlined within the NPPF. Namely, the application of the Sequential Test and support of a Level 2 SFRA.</p> <p>-Should the Sequential Test not be required to be undertaken as part of the Local Plan process, it will be required as part of any subsequent planning application, regardless of whether a detailed FRA is undertaken and appropriate mitigation measures are proposed. Flood risk affecting the site will need to be assessed and quantified, and the</p>	<p>Comments noted.</p> <p>Note that Bolton Copperworks is NOT proposed as an allocation in the emerging Local Plan, rather an opportunity site. Policy DSR5 references flood risk issues and all relevant policy requirements would continue to apply to proposals, including Pol SD5, NPPF Section 14 etc.</p> <p>Note that following discussions at the examination hearings, and to ensure consistency across all Development Site Policies, site-specific flood risk policy requirements</p>	No change.

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												site layout be sequentially laid out to avoid flood risk areas wherever possible. Where this is not possible it is essential that appropriate mitigation is proposed to ensure not only the end users of the site are safe, but that flood risk is not increased elsewhere. It will need to be demonstrated that there are no other sites at a lower risk of flooding that could accommodate such an end land use.	etc were removed and replaced with signposting to general development management policies.	
MMC142	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM54	No	No	No	No	No	No	The modification sets out that that the plan will be reviewed when housing delivery has not met requirements but the trajectory has already not been met. Numerous sites have not progressed as planned. Now is the time to ensure that the plan meets housing needs.	The Inspector has asked for the five years housing land supply and the housing trajectory base date to be updated to the 31st March 2019. The sites in the trajectory reflect the planning permission status at this date and reflect the lead-in and build-out rates included in the HIS (see-Section 10). See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.

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													<p>amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites.</p> <p>There has been progress on a number of sites included in the list:</p> <p>Biddulph, Wharf Road – Masterplan for site prepared and considered by the Council 08/10/19. Biddulph, Tunstall Road – Masterplan for site prepared and considered by the Council 08/10/19. Leek, The Mount - Leek Neighbourhood Plan Steering Group consulting on draft masterplan and design briefs for Mount Road 18/11/19. Cheadle North – Hybrid planning application approved subject to S106 14/11/19. Cheadle Cecilly Brook – 121 dwelling scheme S106 Agreement complete. Decision due 15/11/19. Cheadle Land at the Birches – Full Planning approved 19/06/2019. Blythe Vale – site is under construction (118 dwelling approval). Revised scheme to increase number to</p>	

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													146 is pending S106. Barnfields, Leek - RM application submitted for part of site which will keep permission alive. Werrington YO1 – Main modification amends the extent of the allocation to include existing land within prison grounds as option for access.	
MMC176	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM54	No	No	No	No	No	No	The modification sets out that that the plan will be reviewed when housing delivery has not met requirements but the trajectory has already not been met. Numerous sites have not progressed as planned. Now is the time to ensure that the plan meets housing needs.	The Inspector has asked for the five years housing land supply and the housing trajectory base date to be updated to the 31st March 2019. The sites in the trajectory reflect the planning permission status at this date and reflect the lead-in and build-out rates included in the HIS (see-Section 10). See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.

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													<p>year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites.</p> <p>There has been progress on a number of sites included in the list:</p> <p>Biddulph, Wharf Road – Masterplan for site prepared and considered by the Council 08/10/19. Biddulph, Tunstall Road – Masterplan for site prepared and considered by the Council 08/10/19. Leek, The Mount - Leek Neighbourhood Plan Steering Group consulting on draft masterplan and design briefs for Mount Road 18/11/19. Cheadle North – Hybrid planning application approved subject to S106 on 14/11/19. Cheadle Cecilly Brook – 121 dwelling scheme S106 Agreement complete. Decision due 15/11/19. Cheadle Land at the Birches – Full Planning approved</p>	

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													19/06/2019. Blythe Vale – site is under construction (118 dwelling approval). Revised scheme to increase number to 146 is pending S106. Barnfields, Leek - RM application submitted for part of site which will keep permission alive. Werrington YO1 – Main modification amends the extent of the allocation to include existing land within prison grounds as option for access.	
MMC210	Kezia Taylerson	Historic England			MM54							The policy text states that there will be the removal of village boundaries for small villages. This is to allow windfall sites to be considered in the Plan period. We would recommend including a clause to ensure that all local plan policies are applied and that heritage policies are considered when dealing with any windfall sites, that may previously have been outside of settlement boundaries but that now may be considered potentially acceptable.	Comments noted. It is not considered necessary to cross reference to other policies as the plan should be read as a whole. Policy DC2 covering the Historic Environment will be applied in these instances.	No change.
MMC95	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	Mr Alan Corinal di-Knott	Knights 1759	MM55							<p>A number of changes are required to the housing trajectory:</p> <ul style="list-style-type: none"> - Removal of 175 dwellings at Barnfields, Leek which lapsed in August 2019. It is acknowledged that this is beyond the April 2019 base date. If retained in the supply, or push back commencement until 2022/23 (removing 30 dwellings from supply) - London Mill permission expired after the April 2019 basedate. Remove from trajectory or review commencement date in line with HIS assumptions (push back by 12 months - remove 30 dwellings from supply). - Cheadle Road Upper Tean permission for 67 dwellings has expired. Remove from trajectory or revise commencement in line with HIS 	The Inspector has asked for the five year housing land supply and the housing trajectory base date to be updated to the 31st March 2019. The sites in the trajectory reflect the planning permission status at this date and reflect the lead-in and build-out rates included in the HIS (see-Section 10). The Council maintains that the housing trajectory is	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the

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												<p>(push back by 12 months - remove 22 dwellings from supply).</p> <p>The above would result in a minimum of 82 dwellings being removed from the supply.</p> <p>Council's land supply position is not up to date. HIS position of 5.16 does not take account of the above or 10% lapse figure.</p> <p>Land supply position is actually 4.93 years.</p> <p>Local Plan should identify additional sites (e.g. BE041) as the plan will not provide a 5 year supply upon adoption and has a 400 shortfall against requirement over plan period.</p>	<p>robust and that there is a 5 year supply of deliverable sites. Note that a RM application has been submitted for part of the Barnfields, Leek site (13/08/2019) which keeps the permission alive. Also note that the Cheadle Road, Upper Tean site was granted permission on 15/06/2016 (not expired) and had not expired at 31st March 2019. Whilst sites may have lapsed since this date, other sites have been granted planning permission since this date and have not been included in the trajectory.</p> <p>The slippage allowance has been applied to Policy SS4 and also reflected in the 5 year land supply calculation in the HIS. See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an</p>	<p>increased supply on the Blythe Vale site to 5.19 years supply.</p>

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													<p>amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. New site allocations have not been identified as being necessary during the examination process.</p> <p>The NPPF does not provide an absolute requirement to identify sites for the full plan period. New site allocations have not been identified as being necessary during the examination process.</p>	
MMC21 2	Kezia Taylerson	Historic England			MM55							Policy DC2 The Historic Environment indicator only relates to buildings at risk and not the wider heritage at risk agenda. We have made suggested amendments in MM27 and this complements these earlier comments. It may be useful to refer to Historic England's Heritage at Risk register and could usefully also refer to Conservation Areas and data held by the Council. This would allow a fuller consideration of the health of the historic environment in the Council area.	See MMC193.	See MMC193.
MMC21 1	Kezia	Historic England			MM56							There are a number of local green space designations that are being removed from the	Comments noted. Most of the Local	No change.

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	Taylorson											local plan. Are these now going to be considered as part of the settlement and considered as 'white land' suitable for potential windfall sites? If so recommend including a clause to ensure that all local plan policies are applied and that heritage policies are considered when dealing with any windfall sites, that may previously have been outside of settlement boundaries but that now may be considered potentially acceptable.	Green Space designations proposed for removal are protected as open space in any case. It is a given that relevant Local Plan policies would be considered if a planning application came in on any of those sites so it is not considered necessary to state this.	
MMC331	Mrs Angela Turner				MM56							This land (Dorset Drive East and West) has been designated as local greenspace in the Biddulph Neighbourhood Plan. SMDC need to revisit this decision.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. The green space at Dorset Drive East and West is still designated as open space which offers protection under Local Plan Policy C2 (see MM31).	No change.
MMC392	MR Kingsley Rowland				MM56							See standard summary in MMC256.	See standard officer response in MMC256.	See MMC256.
MMC107	Councillor (Biddulph West)				MM56, MM73	No	No	No	No	No	No	Object to deletion of Dorset Drive East and West as LGS. Concerned that this will put them under the threat of development and	Refer to Inspector's Post Hearing Advice – Main	No change.

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	Alistair McLoughlin											impact on flooding problems in the town. Other areas proposed for designation as LGS in the Neighbourhood Plan have not been included in the Local Plan.	Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Dorset Drive East and West Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. The green space at Dorset Drive is still designated as open space which offers protection under Local Plan Policy C2 (see MM31).	
MMC33	Mr & Mrs M Turnock				MM56 p.109							Object to deletion of LGS at Dorset Drive East & West (Biddulph). This has been a safe area for children to play for several decades and local residents keep it tidy and litter pick as it is highly valued.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. The green space at Dorset Drive is still designated as open space which offers protection under Local Plan Policy C2 (see MM31).	No change.

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MMC51	Mr & Mrs J. A. & C. Hamnett		Mr Kenneth Wainman	Director Ken Wainman Associates Ltd	MM57	Yes	Yes	Yes	Yes	Yes	Yes	This modification now omits privately owned land in the Green Belt from the Open Space designation in Cheadle Park. This land is not used as open space and was included in error in the Submission Local Plan.	Comments noted.	No change.
MMC6	Miss Gabrielle Bailey				MM59 page 230			No				Objects to deletion of LGS 47 (Caverswall Old Road, Blythe Bridge) MM59. Concerned that as a result the space will be developed and consequently lost to the community. Would like to see LGS designation reinstated.	The green space at Caverswall Old Road is still designated as open space which offers protection under Local Plan Policy C2 (see MM31). Regarding the reasons for deleting the LGS, refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.	No change.
MMC14	Mr John Housley				MM61							As a resident of Cheddleton...I would like to know how..these 2 fields [LGSs refs 29 &30] have attracted the attention of a Government Inspector - question if it is to do with planning applicant turned down twice - and removing LGS [designation] will make it easier to get the plans passed. We currently take/collect our grandchildren from school, we use the gully (footpath) between the 2 fields (which we used to take our own children 40 years ago). The safest most tranquil carbon monoxide-free walk with far reaching views of the surrounding countryside. Our grandchildren are always asking us [questions about] gaps between hedges, another safe way of learning	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed main modifications	No change.

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												about our beautiful countryside. These open fields are a credit to Cheddleton. The importance of these 2 fields is paramount to the area especially the diverse wildlife, and visitors to the area to and from local attractions. I believe to lose its LGS would be catastrophic for Cheddleton and future generations. Hope your decision will not be financially motivated.	to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC82	Alison Tonge				MM61							I want to protect wildlife for the future.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change
MMC34	Mary Worwood				MM61							Object to loss of LGS designations at Ox Pasture, Cheddleton. Green spaces are vital due to their physical and mental benefits, Building on them would create more pollution and an increase in respiratory diseases. Fields provide a setting for historical centre of Cheddleton and are important for biodiversity.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed	No change.

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													main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC93	Denise Gee				MM61							No coincidence that local residents have a Bounty of Queen Covenant on their deeds connected to the entrance and the land of the fields to protect the area. Consequently the area has been a much loved and treasured part of the village for years and continues to be so. Abundance of natural habitat and flora. Local school children use this part of the village for its historic value, environmental lessons and emotional and health and well being learning. Emotional health is at top of government, councils and schools of their remit. Area is a welcome break to contemplate and can take in view. Area connects with past generations. St Edwards the Confessor church can be seen from the area, it connects connects and has significance for the whole village. Please protect the village and give it green space it deserves.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC90	ms liz nokes				MM61							Moved to my house because of the fields. Green open spaces sustain wildlife provide peace and stillness away from cars and roads. I chose to live here with open aspect to the east toward Coombes Valley and Morridge which is a peaceful view enjoyed by people on the footpath between the fields. Cruel to take fields away to make a few people rich to the detriment of wildlife and the public. Designate as green open space let developer do the community some good and develop a brownfield site.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations	No change.

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													<p>the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC99	Jane Barlow				MM61							<p>Walking the footpath from Ox Pasture to the church is like walking back in time. Hedgerows, birds, blackberries, wildlife, wildflowers and spectacular views of the countryside. Is a gateway to the historic centre of the village which should be cherished, need to maintain integrity of the historic village.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC117	Rob Belson				MM61							<p>Fields are special hold echoes of my childhood, used to play there with friends. Today there are an area to rest unwind and get back to nature. No roads border them something that's unique. Quiet place. Opportunity to escape modern Cheddleton and approach older Cheddleton on foot as previous generations have done. Are rabbit holes, fox set, newts and other creatures. Should remain green space once it's gone it will never be brought back.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the</p>	No change.

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													Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC106	Mr Geoff Preston				MM61							Village needs open space lungs where people can breath clean air, enjoy tranquillity and spaces where young and old can play and rest in safety. Island of open space are precious need to be kept public lest we condemn our citizens to live in a featureless sprawl of new housing. Expansion should be on brownfield sites. Older property should be redeveloped to conform to new environmental standards.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC85	David Abbott				MM61							Moved here 12 years ago attracted by the character of the area old part - Hollow Lane, church Fold Terrace, the Gully and open fields. Regularly walk the area to avoid main roads, is a walk in the countryside with wonderful views. Fields are a green lung for the village, with wildlife adds to quality of life. Loss of fields would lose area's peace and quiet and make town the same as others.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter	No change

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												Building on fields would lead to increase in traffic/pollution with access and road safety problems; particularly for parents/children going to school.Village does not need increased pressure on infrastructure.	(EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC123	Marj Edwards				MM61							Lived in village all my life, fields are special to community. Provide valuable area of tranquillity and are in the heart of the village. No roads adjacent to the fields. Are well used public footpaths. Users of footpaths appreciate the tranquillity and abundance of wildlife. Paths are away from traffic, pollution and noise making them a safe walk for young and old. Are a safe route for children to school and to the church, churchyard, community centre and tea rooms. I strongly object to this application and extremely concerned for wildlife.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC127	Robert Gee				MM61							Not without reason that a Crown (Queen Anne) Covenant covers the entrance and land to the fields. They were valued hundreds of years ago and still valued today as Green Open Space to be protected, valued and appreciated for all those who reside in the village and to appreciate the significance of	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and	No change.

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												the historic heritage of this part of the village. Local farmer traditionally farms the areas. Local school children use it for environmental lessons. Ramblers pass through it. Abundance of wildlife due to its tranquillity and undisturbed habitat. This peacefully leads you to our 1200 century gem of a church.	subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC129	Trevor Hulme				MM61							Fields are important to village as they provide habitat for variety of flora and fauna, some in protected category. Provide a learning ground for future generations. Numerous walking groups use the public footpaths to enjoy the panoramic views, improve their health, used as an access route to the historic village centre where they can visit the church, community centre [pub and tea rooms. LGS designation would protect the area from harm and save it for future generations.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC132	Tabitha Lawrie				MM61							Provide area of tranquillity in heart of the village. No roads adjacent to the site but are well used public footpaths. Users of footpaths appreciate the tranquillity and visual relief sites provide away from traffic noise/pollution. Path	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters –	No change.

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												used on a daily basis by young and old, safe pedestrian access from housing estates to school, church, community centre, tearoom/craft centre and pub. Open nature of the sites gives exceptional uninterrupted views of historic centre of the village and Peak District beyond. Appreciated by locals and visitors. Recreational walking groups that visit specifically include paths around the field in their walks and value the visual amenity fields' offer. They contribute to the special character of the village, provide green buffer separating historic centre from more recent development. Consequently community and successive authorities have protected the sites from urbanisation through eight decades of village expansion.	paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC114	Pat Day				MM61							Whilst I accept the need for affordable housing * I feel the development of the village and particularly the older part of the village , around the church could cause major traffic and safety problems. Development needs to be done sensitively and in a sensible way.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC223	Judith Abbott				MM61							Two fields are important space between the Conservation Area and newer residential areas. Buffer emphasises special qualities of	Refer to Inspector's Post Hearing Advice – Main	No change.

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												the ancient church. Access to open space and nature important to mental health. Walk through the fields once a day love the peace and quiet. Hedges full of birds, fields have a range of wildlife. Fields add to the attraction of the village, used by visitors. Should be preserved once lost can never be recovered.	<p>Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC229	Rachel Sherratt				MM61							<p>Fields are special are an important buffer separating the old village and newer developments, supporting the Conservation Area and character of the old village. Enjoyed walking to school/brownies along the gully. Safe and pleasant route, countryside views, supports wildlife. Sunken nature and dry stone walls generate a sense of significance, as you retrace the tracks many generations have walked before. Fields are special and important.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC24	Jennifer				MM61							Loss of fields will be detrimental to the	Refer to Inspector's	No change.

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3	Hulme											<p>environment and character of the town. Where will the children go for nature classes. Loss of flora and fauna. How will the next generation know about these. Paths used on a daily basis by young and old. Used by the local walking for health group, loss will result in greater pressure on NHS. Fields are a buffer between historic centre of the village and newer housing estates. Are panoramic views over the countryside. Will be lost forever LGS designation would protect sites from harm.</p>	<p>Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC247	Stephen Wales				MM61							<p>Need open space near peoples homes. Need to allow countryside, it's flora and fauna to be part of village life in heart of the village. Constant infilling destroying feel of living close to the countryside and village living is turning into urban sprawl. Will destroy visual amenity. Facilities n the village almost non existent no chemist, doctors/dentist, lack of parking mean few businesses survive. Village at capacity, one of largest villages in UK. Increasing through traffic is dangerous. Denial of designation is contrary to Localism Act to empower communities to shape the future of their surrounds.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.

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MMC280	Helen Sherratt				MM61							<p>Fields are special to Cheddleton residents, agricultural meadows not harmed by harsh practices and chemical. To people who the footpaths fields represent rural tranquillity in the heart of the village, with views across to the church and Peak District beyond. Abundant wildlife and are important wildlife corridor. Development would destroy much of the ecosystem. State of Nature 2019 Report highlights decline in wildlife. Government's own assessments indicate UK will not meet most of the global 2020 targets it committed to through the Convention in Biological Diversity. National Trust, RSPB and Staffordshire Wildlife Trust all calling for protection of wildlife corridors to preserve habitats and national species.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC257	Robbie Sherratt				MM61							<p>Open spaces in Cheddleton give it a unique and special character. Fields form an important buffer separating the old village centre/Conservation Area from the newer development. Are important in preserving historic character of the old village. Footpaths enjoyed by many people, have near and far reaching views. Extensive wildlife and tranquillity, safety with no traffic. People exercise walking the paths benefiting from the open rural atmosphere. Village has developed historically Church of St Edward the Confessor dates back to 13th & 14th centuries. Views from the public footpaths of the village and church. Local historian suggested field 29 takes the place of the lost ancient village green. Development of the fields would detract from the rural character and setting of the old village/Conservation Area. Are the only open space on western side of the village, not everyone can walk to recreation ground or canal with steep inclines involved. Benefit of windfall development vastly outweighed by significance of fields to local residents.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS</p>	No change.

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													designations.	
MMC286	Ian Dakin				MM61							I value the green spaces. Important to my health and well being, provide a place of tranquillity with great views to the hills and Cheddleton. Walk here with my dog. Is abundant bird life in the trees/hedges. eadows provide habitat for insects and bats. Loss of the fields would contribute to climate change, is a concern, particularly to the young in the village. Would be against the Council's aim of carbon neutrality by 2030. Another resident and I have made a video recording the thoughts of local people. I submit this as evidence in favour of protecting the green spaces and how much the community values them, YouTube link provided in the attached email.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC335	Derek Walker				MM61							Increased light pollution will render the equipment of the many local astronomers to be inadequate. My parents and grandparents pointed out wildlife to me in this area, I am doing so to my children and my great grand children. Area is one of the few I can wander in peace in my advanced years I am limited to short walks.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local	No change.

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													community in support of the LGS designations.	
MMC329	Tony Williamson				MM61							Character and feel of the village dependant on areas of green space such as Ox Pasture fields. Tragedy to take it away.Village needs these spaces to maintain wildlife ad preserve access to school and church.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC343	Janette Barr				MM61							Two fields are special to me for many reasons. Biodiversity - important green corridor in heart of the village and to the Churnet Valley. Bats, hedgehogs, badgers, grass snakes and great crested newt (confirmed by DNA testing) have been recorded. Provide tranquillity and cherished views, used by school children. Rural character - provide buffer between old Conservation Area and newer housing estates. Setting of heritage assets - village part of Churnet Valley attracts tourists to listed church. Visitors walk the paths through the village and these fields. Loss of fields would damage village's heritage assets. Localism - community have demonstrated that the fields are special and should be protected. Over 370 objections to recent planning application. 825 signature petition in response to current consultation. Should be LGS.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information	No change.

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													has been submitted by the local community in support of the LGS designations.	
MMC32 2	Jill Proffitt				MM61							Lived in Cheddleton for over 40 years.Me and my family want to protect our green space for current/future generations. Fields help form character of Cheddleton. Little piece of heaven offering healthy environment, breathtaking views and wildlife. Promote mental and physical health., aids community well-being, provides wildlife habitat, decreases air pollution, improves air quality, decreases noise and offers peace and tranquillity.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC35 0	Lisa Salt				MM61							Fields are of significant meaning and value to village and community. Time when environment and carbon emissions are a major issue seems counter productive not to protect these areas. As village with limited in infrastructure area provides tranquil and safe environment I used daily. Beneficial to my health and well being due to uplifting ambience created by views to the church and countryside. Public Health England have stated healthy places make people feel comfortable... affirming necessity to protect these areas.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.	No change.

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													Further information has been submitted by the local community in support of the LGS designations.	
MMC356	Lynne Barnsley				MM61							<p>Deep concern regarding removal of LGS designation from fields at Ox Pasture. Are important for current and future generations. Footpaths - I regularly use the footpaths between the sites. Used by residents and visitors to get to the school, church, community centre, tea rooms and pub and simply for enjoying the environs. Uninterrupted views from the the footpaths. Biological diversity -Hugh variety of birds and wealth f wildlife. Without protection this could be lost. Historic Heart of the Village - Are close to old village and Conservation Area. Form an important buffer between historic village and newer developments. Recover Nature and Leave our Environment in a Better State than we Inherited - SMDC has declared a climate change emergency ask you to consider if removing LGS designation would help SMDC progress towards that goal or be in direct opposition to what our elected representatives have agreed.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC373	Harold Gleave				MM61							<p>If two fields are lost Cheddleton will never be the same again. A green area is essential to the heart of every village.. Have no desire to turn into a small town. No one in Cheddleton wants to loose this green space. We are the ones who live here why should we not be the ones to make the decision. Development would not enhance quality of life would be a disadvantage. Ox Pasture has already started turning into a car park at critical times. Access to the site has it's dangers. More pollution, noise, traffic people but no more jobs in Cheddleton.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council</p>	No change.

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													Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC374	Brenda Jennings				MM61							In 1972 bought my house due to sense of history, old village still intact acting as a hub and anchor for the new development. New houses on Cheddleton Fields have removed views. Hate the thought of losing more of this fragile heritage. Fields old rural identity of the village and mark its essential difference, The views for the gully, over the land, set it in the landscape and explain its place in the Churnet Valley. I am one of many who hold Cheddleton dear to their hearts. Would be great sadness to me to see it reduced to another collection of housing on the outskirts of Leek. Have attached walking guide to the area in response.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC403	Ms Louise Eyre	Parish Clerk Cheddleton Parish Council			MM61							Ox Pasture East 30. Small field in historic heart of Cheddleton adjacent to Conservation Area. Public footpaths on the field. Originally designated as VOS in 1998, reassessed and confirmed in 2008 and recommended as LGS in 2016 Study using NPPF criteria. Tranquillity – Provides valuable area of tranquillity, no roads around it, away from traffic and pollution. Footpaths well used by young and old . 2016 Study found it has high tranquillity. Beauty – Provides exceptional and uninterrupted views into settlement and beyond. 2016 Study described views as attractive. Recreational Value – used by walking groups.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local	No change.

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												<p>With LGS 30 contributes to special character of the village by providing green buffer between historic core and more recent residential development. Has been protected from urbanisation through eight decades of village expansion. Surrounding properties have restrictive covenants effectively preventing access to the fields illustrating their special significance and wish to retain open space. Village is in Churnet Valley Master Plan. Heritage Value – Open views of designated heritage assets can be appreciated in the historic rural context. Part of the setting of Conservation Area. Still used for hay making. Biodiversity and ecological value.</p> <p>- Richness of wildlife makes it important to local biodiversity. Professional ecological appraisal in March 2019 found five habitats have the potential to be used by variety of species including priority and protected species. Part of a dispersal corridor forms a network with the Churnet Valley.</p> <p>Community support - petition of 825 people in support of LGS.</p>	<p>Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC402	Ms Louise Eyre	Parish Clerk Cheddleton Parish Council			MM61							<p>Ox Pasture (west) 29. Small field in historic heart of Cheddleton adjacent to Conservation Area. Public footpaths on the field. Originally designated as VOS in 1998, reassessed and confirmed in 2008 and recommended as LGS in 2016 Study using NPPF criteria. Tranquillity – Provides valuable area of tranquillity, no roads around it, away from traffic and pollution. Footpaths well used by young and old . 2016 Study found it has high tranquillity. Beauty – Provides exceptional and uninterrupted views into settlement and beyond. 2016 Study described views as attractive. Recreational Value – used by walking groups. With LGS 30 contributes to special character of the village by providing green buffer between historic core and more recent residential development. Has been protected from urbanisation through eight decades of village expansion. Surrounding properties have restrictive covenants effectively preventing access to the fields illustrating their special significance and wish to retain open space. Village is in Churnet Valley Master Plan. Heritage Value – Open views of designated heritage assets can be appreciated in the historic rural context. Still used for hay making. Biodiversity and</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.

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												ecological value - Richness of wildlife makes it important to local biodiversity. Professional ecological appraisal in March 2019 found five habitats have the potential to be used by variety of species including priority and protected species. Part of a dispersal corridor forms a network with the Churnet Valley. Community support - petition of 825 people in support of LGS.		
MMC53 1	Ms Louise Eyre	Parish Clerk Cheddleton Parish Council			MM61							Cheddleton Parish Council believes that the material previously submitted to the LGS consultation, concerning Land adjacent to Ox Pasture did not receive sufficient consideration in order to make a sound decision. Time restraints did not allow a full investigation to take place. In the intervening period, much more work has been done to strengthen our submission. Most has been undertaken by residents, who feel loss of our green space would be very detrimental to our village and its community. Consider that the material now submitted, answers all the 3 criteria required by the Visual Open Space designation in the Local Plan of the 1970s, should be restored in its latest incarnation. Recent Government announcement on Climate Change stated an intention to increase the number of green spaces if necessary by creating new ones. 'Why, then, are we in danger of losing our precious green space, which has been in existence for so many years?	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC55 3	Victoria Berringer				MM61							Area contributes to physical and mental health adding exercise on a village walk through the tranquillity of being surrounded by nature and clean air away from traffic. Are views of Staffordshire Moorlands, can hear birds singing. Is a green lung in the village. Used by parents and children walking to school, parents can point out natural features. Place for people to meet and talk. Haven for wildlife. Suggest land is offered for purchase to the Cheddleton Land Charity trust for rewilding as part of the Climate Emergency strategy.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local	No change.

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													Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC451	Laura Jones				MM61							Myself and young family live in Cheddleton. Have enjoyed walking the gully for many years. Children enjoy tranquil footpaths, views and wildlife. Open sites create a sense of well-being fuel young imaginations. All on our doorstep a small welcome break between the houses and the village. Should we not protect historic footpath for our's children's children to enjoy. From the footpath our magnificent views of the heart of the village -listed church and the Peak District. Gully and footpath used by most people who reside and visit the village. Take walkers to the centre of the village. To the church, pub, community centre and are used twice a day on the school run by many. Little haven enjoyed by many.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC508	Mr Paul Jones				MM61	No	No	No	No	No	No	Would like to express the importance of this area to my family and the local community. Hope the Inspector will observe the overwhelming support for LGS designation. - Removal of this designation will lead to housing development - The area provides a recreational use and views across the area - Footpaths are well used and provide safe alternative away from traffic	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed	No change.

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												<ul style="list-style-type: none"> - Impact on the heritage and conservation setting / loss of views - Abundance of wildlife - Overwhelming support from the local community to demonstrate how important this open space is to the village. - Evidence supported by the refusal of a planning application. - Disagree with the Inspector's decision that the site is not demonstrably special. <p>Provide:</p> <p>Appendix 1 survey indicating how the land is demonstrably special to the local community.</p> <p>Appendix 2 article showing protest march.</p> <p>Appendix 3 Youtube video poem called Cheddleton Fields</p>	<p>main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC526	Marion Hammond				MM61							<p>Fields provide area of fresh air away from pollution and traffic. In 1953 with came to live in Cheddleton for health reasons. My husband had contracted TB and advised to live where there were open field, fresh air and trees. I have seen development of large housing estates over the years. Two fields are the last small area in the centre of the village kept as green fields. Number of veteran trees which help to cleanse the air and add to the beauty of the area. Walked through the area to collect children from school, are wonderful views of the Roaches. I am a water colourist have painted this part of the village because of its views and trees. I have attached 2 photos of my paintings</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC53	David				MM61							Myself and family have walked the footpath	Refer to Inspector's	No change.

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8	Hatchard											<p>known as the gully for over 30 years. Views of village and distant hills are spectacular. Fields support large variety of flora and fauna. Fields are being run down hedges and trees not cut is a practice used by developers to make it easier to obtain planning permission.</p> <p>If LGS removed it will be lost forever would be more acceptable to develop in the green belt.</p>	<p>Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC54 2	Richard Tufft				MM61							<p>Lived in village since 2003 area is an an area of tranquillity, should be preserved as the heart and lungs of the village, is vital to residents well being.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.

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MMC548	Ken Wheawall				MM61							<p>The fields are a good refuge for birds, hedgehogs and other wildlife. To lose the fields to housing is a total waste. I use the footpath on a regular basis as do the young and old to get to and from the church, school, tearoom and the pub to meet up with family, friends and local community.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC574	Barbara Hine				MM61							<p>Two areas of open space, the centre of Cheddleton are a quiet and peaceful oasis between two busy roads. Gully which passes through them is a safe thoroughfare which enables children and villagers to get to school, walk their dogs, attend church, Black Lion etc. Would hate to see the fields spoiled by housing, area would not be out of place in wilds of Scotland with the high hedges. Fields left alone for wildlife. Cheddleton does not want any more housing estates.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS</p>	No change.

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													designations.	
MMC558	Philip Ash				MM61							I have lived in the village for 10 years and used the footpath. I strongly object to this lovely green space losing its special status.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.	No change.
MMC554	Mr and Mrs R Beresford				MM61							The two fields are of the upmost importance to the richness of wildlife. Regular use of the footpath for the young and elderly, visiting the school , the church, community centre, tea rooms and the public house. All this through a safe access for the public to meet family friends and the local community.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change
MMC564	Mary Mellor				MM61							Would like the Ox Pastures Fields to be protected with LGS designation and for this beautiful part of Cheddleton village to be preserved for future generations.	Refer to Inspector's Post Hearing Advice – Main Modifications and	No change.

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												Value the safety of being able to walk along the path known as The Gulley to access village amenities and there are also health benefits. The views are outstanding and the hedgerows are filled with birds. The fields are in effect the same as green belt helping to retain the character and setting of the historic village centre.	Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.	
MMC54 1	Mrs B Gildart				MM61							I have lived in the village since 1961 and have walked down 'the gully' with my family. It is a secure and safe footpath. Concerned about losing this oasis of green in the middle of the village and for it to be lost to future generations.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.	No change.
MMC54 3	Mrs B Gildart				MM61							see summary of response to MMC541	see officer response to MMC541	No change.
MMC54 5	Nigel Belson				MM61							Decided to live in Cheddleton due to it's semi rural aspect and village feel. Fields around the gully protect the Conservation Area. Didn't want to live in an urban area. Son has also moved here. Walk the gully with my grandchildren, they can play without fear of cars. Can watch the bats in the twilight. Loss of fields would be a disaster lose the identity of the village particularly the Conservation Area. Cheddleton is semi rural would become another urban sprawl. Hikers regularly come to	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the	No change.

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												Cheddleton due to it's historic setting. If LGS lost local businesses would suffer.	Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC547	Philippa Barnet				MM61							Two fields on either side of the gully provide beautiful tranquil walk in heart of the village. Safer alternative to using pavements. Are full of wildlife, habitat for many protected species. Spectacular views of the Conservation Area and the Peak District. Should be protected for future generations to enjoy. Once destroyed by development can never be replaced. Are more suitable brownfield sites that can be developed.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC551	Raymond Berringer				MM61							Green areas important to urban world. Make them so much more liveable. Beautiful green open areas adjacent to Cheddleton's historic centre should be protected from developers and preserved by being classed as Green Space. Is a corridor of species rich nature connecting two housing areas. Spectacular views of the Peak District. Footpaths used particularly by parents and children walking to	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter	No change.

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												the primary school.	(EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC557	Mark Sherratt				MM61	No	No	No	No	No	No	Local Planning Authority failed to engage with local residents in consultations from the start leaving LGS status vulnerable to challenge on the grounds of not being demonstrably special to a local community Wardell Armstrong Report was not consulted on and did not recognise the importance to the community of the area including the ancient gully footpath, the heritage views, preserving the rural character and setting of the village. Specialness of Ox Pasture recognised by planning committee who refused development in August. Lichfield Diocese own Ox Pasture east also respect special nature of the land by maintaining it to keep views. Inspectors post hearing advice was done without the benefit of any evidence from the community consultation as there wasn't one. Is in conflict with Localism Act. Removal of LGS influenced by a desire to find windfall developments, other more appropriate sites could have been found. More work should have been with Stoke on Trent City Council as part of the Duty to Cooperate. Everyone enjoys using the footpaths but loss will effect young, old and disabled most. Young can play away from roads, learn about flora and fauna, walk to school will be lost. Old and disabled may not be able to walk to other open areas, which involve hills. Removal of LGS a breach of the Equalities Act 2010. Ox Pasture east and west should be a LGS in the Local Plan. If alternative land is needed for windfall development then permissions	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations. Refer to details of the consultations carried out during the Local Plan preparation process and duty to cooperate work EL5	No change.

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												granted since Inspector's recommendation should be considered. Alternative sites could be found with consultation with neighbouring LPAs.	and EL9.	
MMC56 1	W A Leather				MM61							Consider it would be a shame to lose our green space as I really enjoy walking my dog along the gulley and admiring the beautiful views which would be lost.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.	No change.
MMC56 7	D and P Shallcross				MM61							Would be in the interest to all those who use the gully and the path up to Ostlers Lane behind Ox Pasture. Is safe and peaceful no traffic and pollution, can hear church bells, see the Roaches and the wildlife. Important to keep our green spaces for future generations.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC56	Freda				MM61							Enjoy the views to the old village and beyond	Refer to Inspector's	No change.

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9	Belson											to the Roaches. My family and grandchildren enjoy walking the footpath and gully on the route to school. Can watch seasons change hear the birds without traffic noise. Can watch the birds in the evening. Cannot imagine Cheddleton without this wonderful oasis of land. The heart and lungs of our village. Would find it hard to explain to my grandchildren why this sanctuary for wildlife could be lost. Would love them to be able to enjoy walk the paths on searches for wildlife in safety away from busy roads. Protect small green space the village has for future generations once lost is gone forever.	Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC571	Pauline Spooner				MM61							Once open space is gone is gone forever, replaced by a housing estate which would be tragic. Community have enjoyed the space and views of the church for generations, should be preserved for future generations. If lost school children, walkers and villagers will no longer be able to walk the gully in tranquillity and safety. Are wild flowers and wildlife. Should not lose such a beautiful spot, means so much to us. Cheddleton would become one large village.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.

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MMC505	Cath Hill				MM61							<p>I would like you to consider my comments regarding your recommendation to remove the designation of Local Green Space namely the land referred to as the West (29) and East (30) side of the Gully to the rear of Ox Pasture, Cheddleton.</p> <ul style="list-style-type: none"> - I believe that these pieces of ground are demonstratively special to myself, myfamily and the community of Cheddleton. - it is used as a safe footpath away from traffic - it is used for recreational use. - it has ecological value - it is part of our village heritage - it should be protected for future generations to enjoy. <p>These fields are an important part of the village, they are a sanctuary for wild life and border the conservation area and the heart of our village and to risk losing them to development in the future would a disaster to our village, I would therefore like to ask that you give the fields in our old village the protection they need to remain untouched and not allow the small part of what is left of it be destroyed.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC588		Cheddleton Residents – Save Our Green Space			MM61							<p>The community of Cheddleton was not consulted on these LGS designations or the Inspector's post hearing advice until late in the Local Plan examination process (mid Feb 2019). Subsequently [the group] presented evidence demonstrating why we consider these sites are important and special to us. In spite of this the Inspector's recommendation is still that these sites are not "demonstrably special". We have not been given the reasoning behind this opinion. As part of this latest consultation (October 2019) we have submitted updated evidence..</p> <p>We respectfully ask the Inspector to recognise and endorse the local community's clear wish to protect these sites by agreeing to reverse his recommendation.</p> <p>During the SMDC public consultations and publication of preferred options these sites were [only] shown as LGS as supported by the LLGSHIA [evidence]. We [assumed] public responses were not sought on the LGS designations. Consequently, the community saw no need to comment at that time.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.

											<p>[Responses to points contained in Inspector's post-hearing advice]:</p> <ul style="list-style-type: none"> • [Insp refers to 'high bar' para 77 LGS designation]: 2016 study reviewed the sites against NPPF 'bar' and found sites suitable for tranquillity /visual amenity /ecological / recreational reasons (like NPPF examples). Insp did not explain why he disagreed. The local community had not had an opportunity to demonstrate specialness. • [Insp stated "<i>The fields at Ox Pasture are attractive. However, I do not consider that their designation as LGS is justified on the basis of them being 'demonstrably special'</i>"]: the local community had not had an opportunity to demonstrate whether the sites were special to it. • [Insp refers to LGS protection being equivalent of green belt; and therefore LGS limiting rural windfall opportunities]: Modified Local Plan shows net rural requirement 698. 47% (330)[is through] windfall..An equitable contribution from Cheddleton would be approx 5pa [18% larger villages population]. [Argue] Staffs farmers site pending housing approval meets next 5 years. <p><u>SMDC Review of LGS Designations:</u> Response to Inspector's responses:</p> <ul style="list-style-type: none"> • [Insp states Para 77 NPPF says LGS designation not appropriate [in most cases]]: In the revised NPPF (2019) the criteria for designating an LGS is no longer prefixed by the sentence "<i>The Local Green Space designation will not be appropriate for most green areas or open space</i>". • [Insp states all 3 bullets in para 77 must be met]: bullets a) and c) these two pieces of land are both in close proximity to the community and neither is extensive. Bullet b) the local community has now demonstrated that the sites are special to it through an 825 signature petition and evidence submitted by the Parish Council and numerous individuals. • [Insp states he's had regard to Government PPG on LGS designation]: The relevant paragraphs reiterate the bullet points in NPPF (2019) paragraph 100, in particular the primacy of the local community and local discretion. • [Insp reiterates para 007 PPG – para 99 that designations need to be..sustainable development]: These open spaces support our community's health, social and cultural well-being through their tranquillity, the beauty of their views, and helping to mitigate the effects of pollution and climate change. They contribute to protecting and enhancing local biodiversity and ecological networks, and to the settings of designated heritage assets. They maintain the separate and distinct rural character of the historic core of the village. Consequently, they highly unlikely to meet the objectives for achieving 		
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											<p>sustainable development (NPPF 2019 para. 8).</p> <ul style="list-style-type: none"> • [Paragraph 007 “In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.”]: The modified Local Plan and the Housing Implementation Strategy propose sufficient land to meet identified development needs, including the current housing shortfall. Sites 29 and 30 are not identified as suitable locations and considering them as windfall is conjecture, therefore, their designation has not undermined plan making. Even if they were sustainable these sites could only make a modest contribution to the District’s small sites allowance. The relative insignificance of these two MMs is illustrated by them having been screened out of the Sustainability Appraisal of the main modifications to the Staffordshire Moorlands Local Planviii as they are deemed not to necessitate an update. <p><u>Main Modifications – SMDC Consideration</u></p> <p>At a Council Assembly meetingix on 26th June the Council approved latest [version] Main modifications. The MMs were not debated...Portfolio Holder for Planning.. expressed his disappointment that “the Inspector has recommended changes to LGS, despite.. detailed and robust justification for retaining LGS”.</p> <p><u>Main Modifications – Community Consultation</u></p> <p>The Cheddleton community is resolute in its opinion that these two small fields should have Local Green Space protection...A petition of 825 signatures..has been submitted...In addition, there are many individual consultation responses.. confirms their continued particular significance to the community.</p> <p><u>Conclusion</u></p> <p>Modifications MM61 and MM73 were made solely in response to the recommendations from the Inspector. The District Council, the Parish Council and the local community have supported these designations throughout development of the plan. Although the District Council approved the MMs they were approved en bloc to move the plan examination forward, this doesn’t represent a change of mind on the designation of sites 29 and 30.</p> <p>The deletion of these designations is an unsound modification to our Local Plan in that it is not consistent with national policy and guidance because it doesn’t reflect the wishes or intentions of the local community and local</p>		
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											authorities. Designation would protect the sites from irreversible harm, and help the Council to meet its statutory obligations in regard to designated heritage assets and protected species.		
MMC59 Q	Mr Georg e Jenni ngs				MM61						<p>The fields are special to me as when I was you[ng] we used to go through the gully to meet friends..[etc].</p> <p>If we went to the boat [inn], we'd all come back..I got to walk the last bit on my own. It was peaceful, and because it was fairly isolated there were great skies at night if it was clear.</p> <p>Also, in the summer the view across the valley is pretty great..</p> <p>The snow drifts if there was snow were good for playing.</p> <p>The fields should stay as they are for future generations to enjoy in the same way that I did.</p>	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC59 2	Mr Steve Spoon er				MM61						<p>This is the only footpath which leads to the church, school and community centre, offering beautiful views of landscape, flora and fauna. This would all be destroyed if a housing estate was built in the heart of the village, It is a historic centre and precious.</p> <p>I have enjoyed 68 years of walking along the public footpaths in the village and it would be a travesty to develop in this area. It is a beautiful place of nature and views. I see no benefit to our village with the proposed development only permanent destruction of a beautiful, irreplaceable and special area to myself and many others. It's beauty should be preserved for future generations to enjoy.</p>	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.

MMC12	Rob Sanderson (Homes England)	Senior Planning Manager – Land Homes England			MM64	Yes	Yes	Yes	Yes	Yes	Yes	Homes England supports the amendments to the Development Boundary adjacent to the two sites that it owns in Werrington – i.e., sites WE003 and WE0052 - shown on Werrington Map A4.11 and proposed as part of Main Modification 64. The minor amendments to the Development Boundary (and extension of the proposed housing allocations) will ensure that satisfactory highway access to both sites can be achieved and will help to ensure the future delivery of the sites.	Comments noted.	No change.
MMC91	Mr Andy Brown	Harlequin Development Strategies (Crewe) Limited	Mr Alan Corinal di-Knott	Knights 1759	MM72							A number of changes are required to the housing trajectory: - Removal of 175 dwellings at Barnfields, Leek which lapsed in August 2019. It is acknowledged that this is beyond the April 2019 base date. If retained in the supply, or	The Inspector has asked for the five year housing land supply and the housing trajectory base date to be updated to the 31st	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply

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												<p>push back commencement until 2022/23 (removing 30 dwellings from supply)</p> <p>- London Mill permission expired after the April 2019 basedate. Remove from trajectory or review commencement date in line with HIS assumptions (push back by 12 months - remove 30 dwellings from supply).</p> <p>- Cheadle Road Upper Tean permission for 67 dwellings has expired. Remove from trajectory or revise commencement in line with HIS (push back by 12 months - remove 22 dwellings from supply).</p> <p>The above would result in a minimum of 82 dwellings being removed from the supply.</p> <p>Council's land supply position is not up to date. HIS position of 5.16 does not take account of the above or 10% lapse figure.</p> <p>Land supply position is actually 4.93 years.</p> <p>Local Plan should identify additional sites (e.g. BE041) as the plan will not provide a 5 year supply upon adoption and has a 400 shortfall against requirement over plan period.</p>	<p>March 2019. The sites in the trajectory reflect the planning permission status at this date and reflect the lead-in and build-out rates included in the HIS (see-Section 10). The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. Note that a RM application has been submitted for part of the Barnfields, Leek site (13/08/2019) which keeps the permission alive. Also note that the Cheadle Road, Upper Tean site was granted permission on 15/06/2016 (not expired) and had not expired at 31st March 2019. Whilst sites may have lapsed since this date, other sites have been granted planning permission since this date and have not been included in the trajectory.</p> <p>The slippage allowance has been applied to Policy SS4 and also reflected in the 5 year land supply calculation in the HIS. See comment MMC86 regarding an amendment to the 5 year land</p>	<p>calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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													<p>supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. New site allocations have not been identified as being necessary during the examination process.</p> <p>The NPPF does not provide an absolute requirement to identify sites for the full plan period. New site allocations have not been identified as being necessary during the examination process.</p>	
MMC102	Richard	Gladman			MM72	Yes	No	No	No	No	Yes	The housing trajectory remains unrealistic in terms of expected delivery on allocations in	See comment MMC86 regarding	If the Inspector

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	House											<p>the first five years following adoption. The Council's assumptions are inconsistent with the findings of Lichfield's research.</p> <p>Gladman's revised trajectory calculation indicates that there is only a supply for 3.65 years in line with the 2012 NPPF. In respect of future decision making on planning applications, the more rigorous definition of a deliverable site as defined by the 2019 NPPF would apply. More evidence is required to support the inclusion of sites with outline permission or allocations.</p> <p>Further housing allocations need to be identified.</p>	<p>an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. The trajectory has been informed by research undertaken by Lichfield's on lead in times as set out in the HIS. The local plan is being examined under the 2012 framework which does not apply the same presumption as the 2019 NPPF in terms of the definition of deliverable. New site allocations have not been</p>	<p>considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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													identified as being necessary during the examination process.	
MMC144	Wainhomes (North West) Limited		Mr Coxon	Emery Planning Partnership	MM72	No	No	No	No	No	No	<p>The housing trajectory is not robust. Two key concerns are:</p> <ul style="list-style-type: none"> - a lack of robust, up-to-date evidence to support the trajectory - a failure to deliver upon previous trajectories and statements in relation to the progress of sites <p>Notwithstanding the fact that the plan is examined under the 2012 NPPF, the onus is on the Council to demonstrate that allocations are deliverable.</p> <p>The HIS fails to provide any evidence such as that outlined in the PPG.</p> <p>Appendix EP1 summarises the changing position on sites with a comparison of evidence to support the trajectory.</p> <p>The HIS amends the start dates for numerous sites I the supply with no new evidence to support the changes.</p> <p>The Council's position on Wharf Road is fundamentally contradicted in a recently published committee report which makes it clear that delivery is challenging due to land ownership issues. The report states that no further work should be commissioned on the site at the present time. this will mean that the site will not start delivering homes for several years and should be pushed back in the trajectory. Removing the site reduces the supply by 125 homes and results in less than 5 years supply.</p> <p>15 units are included at Blythe Vale in 2019/20 but pre-commencement conditions are to be discharged. A further application is to be determined. First completions should be pushed back to 2020/21 reducing the 5 year supply by 30 units. The site is split up and included twice in the trajectory. This results in overlap between phase 1 and 2 which increases development rates to 45 dwellings per annum in 2021/22 and 2022/23. this</p>	<p>The Inspector has asked for the five years housing land supply and the housing trajectory base date to be updated to the 31st March 2019. The sites in the trajectory reflect the planning permission status at this date and reflect the lead-in and build-out rates included in the HIS (see-Section 10). See comment MMC86 regarding an amendment to the 5 year land supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. See also MMC144 regarding an amendment to the 5 year land supply to reflect a potential increased supply of 32 dwellings on the Blythe Vale site. This would give an amended land supply figure of 5.19 years. The Council maintains that the housing</p>	<p>If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased supply on the Blythe Vale site to 5.19 years supply.</p>

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												<p>should be amended so that phase 2 follows on from phase 1. There is not a 2nd developer. this would reduce the supply by a further 45 units (75 in total).</p> <p>Build rates / lead in times are not evidenced.</p>	<p>trajectory is robust and that there is a 5 year supply of deliverable sites. The local plan is being examined under the 2012 framework which does not apply the same presumption as the 2019 NPPF in terms of the definition of deliverable.</p> <p>The Council is committed to delivering the Wharf Road allocation through the Accelerated Housing Delivery programme and a masterplan has been prepared in order to identify some of the challenges associated with the site so the Council can address these issues in order to deliver the site. The masterplan considered by the Council on the 8th October 2019 provides a strategic vision for the site, brings landowners together, provides next steps and assists in the delivery of the allocation. Some owners did not directly participate in the masterplan however they are supportive of the housing allocation and it is likely that some parts of the site are likely to be</p>	

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													<p>delivered before others. A very small part of the site is unregistered but this doesn't affect access to the rest of the site. On this basis the figures included in the trajectory are considered realistic.</p> <p>The Blythe Vale site is now under construction and it is acknowledged that the site is being built out by a single developer. The site is split up and is included twice in the trajectory to reflect the planning permission. It includes the overall delivery of 193 units on site within 5 years and the trajectory rates are based on the assumptions set out in the HIS. St Modwen Homes responded to the HIS consultation (see doc EL8.001) and expected that the site would be built out at 25 dpa (year 1) and 50 dpa thereafter meaning that up to 225 dwellings would be built within the 5 years. This is slightly more than the 193 dwellings currently included in the 5 year supply. It is not therefore considered that the supply should be reduced on this site as Gladmans</p>	

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													suggest by minus 75 units. The site is clearly underway with dwellings being built out which is consistent with the St Modwen Homes response to the HIS. An amendment could be made to change the overall dwelling number in the 5 year supply from 15/30/45/60/43 = 193 to 25/50/50/50/50 = 225. This would reduce the figure in year 4 from 60 to 50 and increase the other years more closely reflect the expected St Modwen Homes build out rates. This could potentially increase the supply on this site by plus 32 units. This would give an amended land supply figure of 5.19 years.	
MMC178	Mr Martin Webb		Mr Coxon	Emery Planning Partnership	MM72	No	No	No	No	No	No	The housing trajectory is not robust. Two key concerns are: - a lack of robust, up-to-date evidence to support the trajectory - a failure to deliver upon previous trajectories and statements in relation to the progress of sites Notwithstanding the fact that the plan is examined under the 2012 NPPF, the onus is on the Council to demonstrate that allocations are deliverable. The HIS fails to provide any evidence such as that outlined in the PPG. Appendix EP1 summarises the changing position on sites with a comparison of evidence to support the trajectory. The HIS amends the start dates for numerous sites I the supply with no new evidence to support the changes. The Council's position on Wharf Road is fundamentally contradicted in a recently published committee report which makes it clear that delivery is challenging due to land ownership issues. The report states	The Inspector has asked for the five years housing land supply and the housing trajectory base date to be updated to the 31st March 2019. The sites in the trajectory reflect the planning permission status at this date and reflect the lead-in and build-out rates included in the HIS (see-Section 10). See comment MMC86 regarding an amendment to the 5 year land	If the Inspector considers it appropriate, revise the HIS and the 5 year land supply calculation to either reflect the minor change to the lapse rate figure to 5.12 years supply or reflect the minor change to the lapse rate figure plus the increased

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												<p>that no further work should be commissioned on the site at the present time. this will mean that the site will not start delivering homes for several years and should be pushed back in the trajectory. Removing the site reduces the supply by 125 homes and results in less than 5 years supply. 15 units are included at Blythe Vale in 2019/20 but pre-commencement conditions are to be discharged. A further application is to be determined. First completions should be pushed back to 2020/21 reducing the 5 year supply by 30 units. The site is split up and included twice in the trajectory. This results in overlap between phase 1 and 2 which increases development rates to 45 dwellings per annum in 2021/22 and 2022/23. this should be amended so that phase 2 follows on from phase 1. There is not a 2nd developer. this would reduce the supply by a further 45 units (75 in total). Build rates / lead in times are not evidenced.</p>	<p>supply to reflect the 10% lapse rate on commitments of 119 included in the Main Modifications schedule rather than the 98 figure included in the HIS which is a difference of 21 dwellings. This would give an amended land supply figure of 5.12 years. The Council maintains that the housing trajectory is robust and that there is a 5 year supply of deliverable sites. The local plan is being examined under the 2012 framework which does not apply the same presumption as the 2019 NPPF in terms of the definition of deliverable.</p> <p>The Council is committed to delivering the Wharf Road allocation through the Accelerated Housing Delivery programme and a masterplan has been prepared in order to identify some of the challenges associated with the site so the Council can address these issues in order to deliver the site. The masterplan considered by the Council on the 8th October 2019</p>	supply on the Blythe Vale site to 5.19 years supply.

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													<p>provides a strategic vision for the site, brings landowners together, provides next steps and assists in the delivery of the allocation. Some owners did not directly participate in the masterplan however they are supportive of the housing allocation and it is likely that some parts of the site are likely to be delivered before others. A very small part of the site is unregistered but this doesn't affect access to the rest of the site. On this basis the figures included in the trajectory are considered realistic.</p> <p>The Blythe Vale site is now under construction and it is acknowledged that the site is being built out by a single developer. The site is split up and is included twice in the trajectory to reflect the planning permission. It includes the overall delivery of 193 units on site within 5 years and the trajectory rates are based on the assumptions set out in the HIS. St Modwen Homes responded to the HIS consultation (see doc EL8.001) and expected that</p>	

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													<p>the site would be built out at 25 dpa (year 1) and 50 dpa thereafter meaning that up to 225 dwellings would be built within the 5 years. This is slightly more than the 193 dwellings currently included in the 5 year supply. It is not therefore considered that the supply should be reduced on this site as Gladmans suggest by minus 75 units. The site is clearly underway with dwellings being built out which is consistent with the St Modwen Homes response to the HIS. An amendment could be made to change the overall dwelling number in the 5 year supply from 15/30/45/60/43 = 193 to 25/50/50/50/50 = 225. This would reduce the figure in year 4 from 60 to 50 and increase the other years more closely reflect the expected St Modwen Homes build out rates. This could potentially increase the supply on this site by plus 32 units. This would give an amended land supply figure of 5.19 years.</p>	
MMC15	Mr John				MM73							As a resident of Cheddleton...I would like to know how..these 2 fields [LGSs refs 29 &30] have attracted the attention of a Government	Refer to Inspector's Post Hearing Advice – Main	No change.

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	Housley											Inspector - question if it is to do with planning applicant turned down twice - and removing LGS [designation] will make it easier to get the plans passed. We currently take/collect our grandchildren from school, we use the gully (footpath) between the 2 fields (which we used to take our own children 40 years ago). The safest most tranquil carbon monoxide-free walk with far reaching views of the surrounding countryside. Our grandchildren are always asking us [questions about] gaps between hedges, another safe way of learning about our beautiful countryside. These open fields are a credit to Cheddleton. The importance of these 2 fields is paramount to the area especially the diverse wildlife, and visitors to the area to and from local attractions. I believe to lose its LGS would be catastrophic for Cheddleton and future generations. Hope your decision will not be financially motivated.	Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC84	Alison Tonge				MM73							I want to protect wildlife for the future.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC97	Denise				MM73							No coincidence that local residents have a Bounty of Queen Covenant on their deeds	Refer to Inspector's Post Hearing	No change.

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	Gee											connected to the entrance and the land of the fields to protect the area. Consequently the area has been a much loved and treasured part of the village for years and continues to be so. Abundance of natural habitat and flora. Local school children use this part of the village for its historic value, environmental lessons and emotional and health and well being learning. Emotional health is at top of government, councils and schools of their remit. Area is a welcome break to contemplate and can take in view. Area connects with past generations. St Edwards the Confessor church can be seen from the area, it connects connects and has significance for the whole village. Please protect the village and give it green space it deserves.	Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC88	David Abbott				MM73							Moved here 12 years ago attracted by the character of the area old part - Hollow Lane, church Fold Terrace, the Gully and open fields. Regularly walk the area to avoid main roads, is a walk in the countryside with wonderful views. Fields are a green lung for the village, with wildlife adds to quality of life. Loss of fields would lose area's peace and quiet and make town the same as others. Building on fields would lead to increase in traffic/pollution with access and road safety problems; particularly for parents/children going to school.Village does not need increased pressure on infrastructure.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.

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MMC92	ms liz nokes				MM73							<p>Moved to my house because of the fields. Green open spaces sustain wildlife provide peace and stillness away from cars and roads. I chose to live here with open aspect to the east toward Coombes Valley and Morridge which is a peaceful view enjoyed by people on the footpath between the fields.</p> <p>Cruel to take fields away to make a few people rich to the detriment of wildlife and the public. Designate as green open space let developer do the community some good and develop a brownfield site.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC101	Jane Barlow				MM73							<p>Walking the footpath from Ox Pasture to the church is like walking back in time. Hedgerows, birds, blackberries, wildlife, wildflowers and spectacular views of the countryside. Is a gateway to the historic centre of the village which should be cherished, need to maintain integrity of the historic village.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS</p>	No change.

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													designations.	
MMC11 1	Mr Geoff Preston				MM73							Village needs open space lungs where people can breath clean air, enjoy tranquillity and spaces where young and old can play and rest in safety. Island of open space are precious need to be kept public lest we condemn our citizens to live in a featureless sprawl of new housing. Expansion should be on brownfield sites. Older property should be redeveloped to conform to new environmental standards.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC11 5	Pat Day				MM73							Whilst I accept the need for affordable housing, I feel the development of the village and particularly the older part of the village , around the church could cause major traffic and safety problems. Development needs to be done sensitively and in a sensible way.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local	No change.

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													community in support of the LGS designations.	
MMC108	Councillor (Biddulph West) Alistair McLoughlin				MM73			No	No			Object to deletion of Dorset Drive East and West as LGS.	See officer response to MMC107.	No change.
MMC120	Rob Belson				MM73							Fields are special hold echoes of my childhood, used to play there with friends. Today there are an area to rest unwind and get back to nature. No roads border them something that's unique. Quiet place. Opportunity to escape modern Cheddleton and approach older Cheddleton on foot as previous generations have done. Are rabbit holes, fox set, newts and other creatures. Should remain green space once it's gone it will never be brought back.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC133	Tabitha Lawrie				MM73							Provide area of tranquillity in heart of the village. No roads adjacent to the site but are well used public footpaths. Users of footpaths appreciate the tranquillity and visual relief sites provide away from traffic noise/pollution. Path used on a daily basis by young and old, safe pedestrian access from housing estates to school, church, community centre, tearoom/craft centre and pub. Open nature of the sites gives exceptional uninterrupted views of historic centre of the village and Peak District beyond. Appreciated by locals and visitors. Recreational walking groups that visit specifically include paths around the field in	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed	No change.

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												their walks and value the visual amenity fields' offer. They contribute to the special character of the village, provide green buffer separating historic centre from more recent development. Consequently community and successive authorities have protected the sites from urbanisation through eight decades of village expansion.	main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	
MMC12 6	Marj Edwards				MM73							Lived in village all my life, fields are special to community. Provide valuable area of tranquillity and are in the heart of the village. No roads adjacent to the fields. Are well used public footpaths. Users of footpaths appreciate the tranquillity and abundance of wildlife. Paths are away from traffic, pollution and noise making them a safe walk for young and old. Are a safe route for children to school and to the church, churchyard, community centre and tea rooms. I strongly object to this application and extremely concerned for wildlife.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. Further information has been submitted by the local community in support of the LGS designations.	No change.
MMC12 8	Robert Gee				MM73							Not without reason that a Crown (Queen Anne) Covenant covers the entrance and land to the fields. They were valued hundreds of years ago and still valued today as Green Open Space to be protected, valued and appreciated for all those who reside in the village and to appreciate the significance of the historic heritage of this part of the village. Local farmer traditionally farms the areas. Local school children use it for environmental lessons. Ramblers pass through it. Abundance of wildlife due to its tranquillity and undisturbed	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's	No change.

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												habitat. This peacefully leads you to our 1200 century gem of a church.	<p>recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC130	Trevor Hulme				MM73							<p>Fields are important to village as they provide habitat for variety of flora and fauna, some in protected category. Provide a learning ground for future generations. Numerous walking groups use the public footpaths to enjoy the panoramic views, improve their health, used as an access route to the historic village centre where they can visit the church, community centre [pub and tea rooms. LGS designation would protect the area from harm and save it for future generations.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC225	Judith Abbott				MM73							<p>Two fields are important space between the Conservation Area and newer residential areas. Buffer emphasises special qualities of the ancient church. Access to open space and nature important to mental health. Walk through the fields once a day love the peace and quiet. Hedges full of birds, fields have a range of wildlife. Fields add to the attraction of the village, used by visitors. Should be preserved once lost can never be recovered.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the</p>	No change.

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													<p>basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	
MMC234	Rachel Sherratt				MM73							<p>Fields are special are an important buffer separating the old village and newer developments, supporting the Conservation Area and character of the old village. Enjoyed walking to school/brownies along the gully. Safe and pleasant route, countryside views, supports wildlife. Sunken nature and dry stone walls generate a sense of significance, as you retrace the tracks many generations have walked before. Fields are special and important.</p>	<p>Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019.</p> <p>Further information has been submitted by the local community in support of the LGS designations.</p>	No change.
MMC245	Jennifer Hulme				MM73							See summary of response to MM243.	See response to MMC243	No change.
MMC249	Stephen Wales				MM73							See summary of response to MMC247.	See response to MMC247.	No change.
MMC28	Helen				MM73							See summary of response to MMC280.	See response to	No change.

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4	Sherratt												MMC280.	
MMC290	Ian Dakin				MM73							See summary of response to MMC286.	See response to MMC286.	No change.
MMC279	Robbie Sherratt				MM73							See response to MMC257	See response to MMC257.	No change.
MMC333	Tony Williamson				MM73							See response to MMC329.	See response to MMC329.	No change.
MMC324	Jill Proffitt				MM73							See summary of response to MM322.	See response to MMC322.	No change.
MMC338	Derek Walker				MM73							See summary of response to MMC335.	See response to MMC335.	No change.
MMC347	Janette Barr				MM73							See summary of response to MMC343	See response to MMC343.	No change.
MMC364	Lynne Barnsley				MM73							See summary of response to MMC356.	See response to MMC356.	No change.
MMC353	Lisa Salt				MM73							See summary of response to MM350.	See summary of response to MM350.	No change.
MMC532	Ms Louise Eyre	Parish Clerk Cheddleton Parish Council			MM73							See response to MMC531	See response to MMC531	No change.
MMC556	Victoria Berringer				MM73							See response to MMC553.	See response to MMC553.	No change.
MMC528	Brenda Jennings				MM73							See response to MMC374	See response to MMC374	No change.
MMC544	Richard Tufft				MM73							See response to MMC542	See response to MMC542	No change.
MMC546	Nigel Belson				MM73							See response to MMC545	See response to MMC545	No change.
MMC55	Ken				MM73							see summary of response to MMC548	see response to	No change.

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0	Wheawall												MMC548	
MMC562	W A Leather				MM73							see summary of response to MMC561	see response to MMC562	No change.
MMC566	Mark Sherratt				MM73							See response to MMC557	See response to MMC557	No change
MMC568	D and P Shallcross				MM73							See response to MMC567	See response to MMC567	No change.
MMC570	Freda Belson				MM73							See response to MMC569	See response to MMC569	No change.
MMC527	Marion Hammond				MM73							See response to MMC526.	See response to MMC526.	No change.
MMC529	Marion Hammond				MM73							See response to MMC526	See response to MMC526	No change
MMC539	David Hatchard				MM73							See response to MMC538	See response to MMC538	No change.
MMC549	Philippa Barnet				MM73							See response to MMC547.	See response to MMC547.	No change.
MMC555	Mr and Mrs R Beresford				MM73							see summary of response to MMC554	see response to MMC554	No change.
MMC559	Philip Ash				MM73							see summary of response to MMC558	see response to MMC558	No change.
MMC565	Mary Mellor				MM73							see summary of response to MMC564.	See response to MMC564	No change.
MMC573	Pauline Spooner				MM73							See response to MMC571	See response to MMC571	No change.
MMC575	Barbara Hine				MM73							See response to MMC574.	See response to MMC574.	No change.

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MMC21	Mr Nigel Yates				MM73 Page284			No	No	No	No	Dorset Drive East and West clearly meet the LGS designation criteria so should be retained as LGS. Deletion of the designation puts them at risk of future development.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. The green space at Dorset Drive is still designated as open space which offers protection under Local Plan Policy C2 (see MM31).	No change.
MMC22	Miss Keelie Cooper				MM73 Page 284/5			No				Dorset Drive East and West clearly meet the LGS designation criteria so should be retained as LGS. Deletion of the designation puts them at risk of future development.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. The green space at Dorset Drive is still designated as open space which offers protection under Local Plan Policy	No change.

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													C2 (see MM31).	
MMC49	Mrs Nicola Hearson				MM73 Page 284/5			No				Dorset Drive East and West clearly meet the LGS designation criteria so should be retained as LGS. Deletion of the designation puts them at risk of future development.	Refer to Inspector's Post Hearing Advice – Main Modifications and Related Matters – paras. 32 & 33. (EL6.004) and subsequent Inspector's letter (EL6.008). On the basis of the Inspector's recommendations, the Council agreed main modifications to delete the Local Green Space (LGS) at the Council Assembly meeting on 26th June 2019. The green space at Dorset Drive is still designated as open space which offers protection under Local Plan Policy C2 (see MM31).	No change.
MMC589		Cheddleton Residents – Save Our Green Space			MM73							Refer to response summary in MMC588.	Refer to officer response in MMC588.	No change.

MMC591	Mr George Jennings				MM73							Refer to response summary in MMC590.	Refer to officer response in MMC590.	No change.
MMC593	Mr Steve Spooner				MM73							Refer to response summary in MMC592.	Refer to officer response in MMC592.	No change.
MMC289	Mr M Clews				MMC12	No	No	No	No	No	No	Refer to MMC179.	Refer to MMC179.	Refer to MMC256.
MMC39	A R Yarwood	Planning Officer National Federation of Gypsy Liaison Groups			MM doc ref 23	No	No	No	No	No	Yes	The modification seeks to show that of the 6 require Traveller pitches, 3 have been secured by the grant of planning permission at a site at Checkley. This is incorrect. The site at Checkley is a single family pitch with just 3 touring caravans and one amenity building. A traveller pitch is normally a site with one caravan for living in (often a static van) and at least one touring caravan and an amenity building. The site at Checkley does not constitute a 3-pitch site. It is a single pitch. Thus the unmet need for pitches is 5, not 3. Plan should acknowledge that there remains a shortfall of 5 pitches which needs to be met by "windfall" provision.	Not agreed. The modification that refers to residual pitch requirements is based on the conclusions of the 2015 GTAA [doc EL18.2], which was discussed at the examination hearings. Planning records such as details of relevant planning consents, were forwarded to the consultants preparing the study. The study also explains how the	No change

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													consultants conducted qualitative on-site traveller surveys on this (and other) sites, as part of the assessment. Table 4.1 for example identifying 3x pitches (2x of which were occupied at the time).	
MMC87	Antje Moller				Tunstall Road Masterplan Executive Summary	Yes	No	No	No	No	No	Object to inadequate consultation, masterplan layout, impact on wildlife / beauty of area, lack of residential amenity for residents of Victoria Row, lack of infrastructure (e.g. doctors surgeries), viability, number of landowners involved, difficult for some people to respond to consultation due to form - consider that alternatives should be explored.	Refer to officer response to MMC105.	No change.