



# Staffordshire Moorlands Local Plan

## Consultation Statement 2016 (Preferred Options and Boundaries) and 2015 (Site Options) Submission Version

February 2018

# Staffordshire Moorlands Local Plan - Consultation Statement February 2018

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## Introduction

## 1 Introduction

**1.1** This statement has been produced in support of Staffordshire Moorlands Local Plan. Preparation of the Local Plan has been undertaken in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Public consultation has been carried out in accordance with the Council's Statement of Community Involvement. (2014 version and subsequently the updated 2016 version).

**1.2** In line with the regulation 19 this statement sets out:

- which bodies and persons were invited to make representations under regulation 18,
- how those bodies were invited to make representations,
- a summary of the main issues raised by those representations, and how those representations have been addressed in the Local Plan.

**1.3** It is part of the Pre Submission Documents and will be made available for comment together with the other documents.

**1.4** The Council sought to involve people at an early stage in the plan preparation process. Early engagement was carried out with the local community and there were three consultations:

- **Early Engagement** 2011 - 2015
- **Site Options Consultation** 7th July - 14th September 2015
- **Preferred Options Sites and Boundaries Consultation** 28th April - 13th June 2016
- **Preferred Options Consultation** 31st July - 22nd September 2017

**1.5** This Statement considers the first two consultations in the following sections. There is a separate Consultation Statement for the Preferred Options Consultation 2017. Each section sets out who was consulted, how they were consulted, the main issues raised in representations received at each stage, and how they have been addressed by the Council in the preparation of the Local Plan. The appendices which provide further details of each consultation exercise. A list of organisations consulted at each stage is included in Appendix 1.

### Duty to Cooperate

**1.6** Strategic planning is a key element of plan-making to ensure that social, economic and environmental planning issues are properly addressed at a larger than local scale. Following the abolition of the Regional Spatial Strategies strategic planning is undertaken through the 'duty to co-operate' requirement set out in the Localism Act and the NPPF, which ensures that local authorities and public bodies that are critical to plan making co-operate with each other and that they are involved in continual constructive and active engagement as part of the planning process.

**1.7** In order to satisfy the duty to co-operate, the Council has involved neighbouring authorities, along with Staffordshire County Council, and will continue to involve neighbouring authorities and other public bodies in order to implement the Local Plan. Discussions and meetings have been held with relevant public bodies under the duty to cooperate. Detail of these can be found in the Duty to Cooperate Statement which accompanies this plan.

## Statement of Community Involvement

## 2 Statement of Community Involvement

**2.1** The Statement of Community Involvement (SCI) describes how the Council will seek to engage with residents, businesses and other organisations in decision making on planning policy documents. The aim of the document is to ensure all sections of the community are involved in the planning process and in the preparation of planning policy documents. The consultation undertaken during the Local Plan preparation process was in compliance with the methods detailed in the SCI. Consultation was carried out with statutory consultees, relevant and specific agencies and the local population and businesses.

**2.2** The SCI was adopted on 13th April 2016 and replaces the Council previous SCI 2014.

**2.3** The style and scope of public consultation has been devised to be appropriate and relevant to the policy decision at issue. The table below lists the SCI consultation requirements and explains how they have been met for each stage of the consultation

**2.4** As this shows, the methods undertaken throughout the consultations have aimed to reach a wide audience, including those hard to reach groups who do not usually engage in the consultation process.

Type of Consultee	SCI Requirements for Site Options and Preferred Options Consultations	How they have been met
Statutory Bodies	Summary document, publication on online portal, meetings (if appropriate), direct notification, response form, website.	All of the statutory bodies are on the Council's Local Plan Consultation Database so they were directly notified about the consultations and their comments were invited either by email or through the post. The other requirements listed were all undertaken as part of the consultation. Meetings have been held throughout the process with relevant statutory bodies and are ongoing.
Parish/Town Councils	Summary document, publication on online portal, meetings (if appropriate), public exhibitions, media releases, paper based, direct notification, response form, Parish and Town Council workshop, website, site notices, posters. Interactive events (for Site Options)	All of the Parish and Town Councils are on the Council's Local Plan Consultation Database so they were directly notified about the consultations and their comments were invited either by email or through the post. The other requirements listed were all undertaken as part of the consultation. Community conversations were held at strategic locations throughout the District. Paper copies of the consultation material were available at all libraries and Council offices in the District. Parish and Town Councils were offered the opportunity to attend a workshop/meetings. Progress on the Local Plan is a standing item at the

Type of Consultee	SCI Requirements for Site Options and Preferred Options Consultations	How they have been met
		Parish Assembly meeting (to which all Parish and Town Councils in the District are invited) and officers attend to give updates and answer queries. Parish Councils were sent posters to raise awareness of the Local Plan consultation and asked to display them within their Parish.
General Public	Publication on online portal, meetings (if appropriate), public exhibitions, media releases, paper based, direct notification, response form, social media, website, mail out, site notices, posters. Interactive events (for Site Options)	All households in the District were sent a flyer to draw attention to the publication of the Local Plan. If they had previously commented (and so they were on the Local Plan database) they were sent an additional communication to notify them of the publication. The other requirements listed were all undertaken as part of the consultation. Site notices, press releases, posters, the Council's website and social media were also used to raise awareness of the consultation.
Local Businesses	Summary document, publication on online portal, Moorlands Together Partnership, meetings (if appropriate), public exhibitions, media releases, paper based, direct notification, response form, social media, website, mail out, site notices, posters. Interactive events (for Site Options)	All businesses in the Staffordshire Moorlands were sent a flyer to draw attention to the publication of the Local Plan. If they had previously commented (and so they were on the Local Plan database) they were sent an additional communication to notify them of the publication. The other requirements listed were all undertaken as part of the consultation apart from a meeting of the Moorlands Together Partnership as this group now only meets very occasionally – typically once a year.
Hard to Reach Groups	Same as general public plus outreach work with hard to reach groups and availability of documents in alternative formats.	Refer to 'General Public' section above. In addition to this, large print versions of the full consultation document and the summary consultation document were produced as a result of a request. Local meetings / forums representing specific groups (e.g. those with a disability) have unfortunately decreased recently due primarily to lack of funding.



Type of Consultee	SCI Requirements for Site Options and Preferred Options Consultations	How they have been met
		<p>Therefore, the strategy taken was to tailor consultation methods to increase the participation of the 'hard to reach' groups (e.g. young people, ethnic minorities and people with disabilities) by:</p> <ul style="list-style-type: none"> <li>•the use of interactive website links;</li> <li>•use of social media such as Twitter;</li> <li>•production of the consultation document in large print;</li> <li>•use of the mobile library to enable more access to paper copies of the Local Plan documents;</li> <li>•ensuring all venues for events were accessible; and</li> <li>•notification of consultation sent to voluntary groups on the Local Plan database as well as the local umbrella organisation 'Staffordshire Moorlands Council for Voluntary Services'.</li> </ul>
Developer/Landowner/Agent	Publication on online portal, meetings (if appropriate), public exhibitions, media releases, paper based, direct notification, response form, social media, website, mail out, site notices, posters. Interactive events (for Site Options)	The Council's Local Plan consultation database includes a number of developers, landowners and agents who are active in the area so many were informed through this mechanism. All the other methods listed were also used to raise awareness of the consultation. Meetings (where appropriate) have been ongoing throughout the process.

Table 2.1 SCI Consultation Methods

## Early Engagement

### 3 Early Engagement

**3.1** Work started on the Site Allocations Document at an early stage in the process of preparing the Local Development Framework. Engagement on the Site Allocations document commenced in 2011 when a number of local community events called 'community conversations' were held. The purpose of these events at an early stage in the development of site options was to engage with members of the community and understand what they value in their village and how the villages could change in the future. Following the adoption of the Council's Core Strategy in March 2014, it was decided that to reflect the Inspector's recommendation of an early review of that plan, it would be more appropriate to produce a full Local Plan, rather than continue with the Local Development Framework Process which was becoming out of date.

**3.2** Two rounds of events were held at locations throughout the Staffordshire Moorlands at the following locations:

- Meerbrook Village Hall
- Rudyard Activity Centre
- St Peters School Alton
- Cheddleton Community Centre
- Ipstones Memorial Hall
- Oakmoor Village Hall
- Whiston Village Hall (twice)
- Werrington Methodist Church
- Brown Edge Village Hall
- Biddulph Moor Village Hall
- Blythe Bridge Village Hall
- St Peters School Caverswall
- Christchurch Church Hall
- Endon Methodist Church
- Waterfall Village Hall
- St Margaret's Church Hall

**3.3** These were widely advertised and anyone could attend (numbers were only limited by the size of the venue and additional events were put on where possible to cater for demand). They were facilitated by District Council Officers and staff from the Staffordshire Moorlands Council for Voluntary Services.

**3.4** At these events, members of the community took part in small workshops where they looked at scenarios from different 'types' of residents e.g. young people buying their first house, older people, families, single people and their needs for housing and services and facilities and how they could be met in that village.

**3.5** The aim of this exercise was to generate ideas about future needs in each village. The second part of the workshops were undertaken around a large scale map / map(s) of local settlements and participants were asked to express their views by drawing on the maps or completing post it notes to cover 3 categories:- areas suitable for development, areas suitable for protection from development, problem areas (e.g. facilities, services, derelict site). This information was collated and used to inform the Strategic Housing Land Availability Assessment and the Site Options Publication.

**3.6** Another important element of the Local Plan preparation process has been early engagement with Town and Parish Councils in order to inform the site options selection process. This commenced in May 2014 when a Parish Assembly workshop was held to discuss site options and boundary changes for all of the settlements. Following positive feed back this consultation was extended in order to recognise the important role that the Town and Parish Councils have in contributing to the future development of their towns and villages. This led to a significant amount of additional information which has informed the identification of site options and some additional site options have been identified.

**3.7** Workshops were also held for Councillors during April / May 2014 which were supplemented by drop in sessions in early 2015. Comments received have informed the selection of site options and development/infill boundaries.

**3.8** There has been an on going process of contacting land owners of the site options, to ascertain the availability of the sites for development.

**3.9** This approach to early engagement before key decisions are made reflects the approach to community involvement set out in the Statement of Community Involvement (SCI) and the guidance in the NPPF which calls for 'early and meaningful engagement and collaboration' with the local community.

## Site Options 2015

## 4 Site Options 2015

**4.1** The Site Options consultation took place between 6th July and 14th September 2015. It was longer than the standard six weeks to take account of the consultation running over the summer holiday period. It sought views on:

- site options for future development,
- development/infill boundaries for the towns and villages listed in the adopted Core Strategy 2014,
- the town centre boundaries, primary and secondary shopping frontages for the towns of Leek, Cheadle and Biddulph.
- broad policy areas for review.

**4.2** It also included a call for sites and details of the Strategic Housing Land Availability Assessment (SHLAA) and minor amendments to the Statement of Community Involvement (SCI).

**4.3** The main source of information was a consultation booklet. The consultation booklet provided details of the proposed options, maps of settlements asked a series of questions inviting comments. It was accompanied by the Strategic Housing Land Availability Assessment (SHLAA) Stage 1, 2 & 3 Summary, and site assessment forms and the amendments to the SCI. The flyer summarised the key issues of the consultation. Paper copies of the documents and response forms were available.

### Who was consulted and how?

**4.4** The Council invited a large number of individuals, organisations, local businesses and statutory bodies to comment on the Site Options consultation.

**4.5** The main elements of the consultation were as follows:

- details of the consultation was on the Council's website and the online portal
- drop-in sessions for the public to attend to discuss the proposals with planning officers. Largescale A1 maps and the consultation information was available (See table below)
- media releases
- social media
- details of the consultation were sent to all contacts on the Councils' planning policy database, including statutory bodies (See table below)
- details of the consultation were to landowners of the sites identified in the document (where these were known)
- details of the consultation was given to Town and Parish Councils to enable them to forward information to residents. Workshops were carried out with the Parish/town Councils in December 2015.
- leaflets regarding the consultation were sent to all households and businesses in the District/Plan area.(See table below)
- details of the consultation were placed on posters next to all the proposed site options
- copies of the consultation document and supporting information were made available at the Council Offices in Leek, Biddulph Councils' Connect Town Hall in Biddulph, Cheadle Councils' connect Cheadle.

- copies of the consultation document and supporting information were made available in the local libraries. Leek Library, Biddulph Library, Cheadle Library, Werrington Library and Blythe Bridge Library.
- response forms were available
- easy guide to how to make comments online was produced
- posters

Consultation Material	Recipient	Number (approx)	Distribution
General postcard	All residents in SMDC	48,000	Postal
General postcard	All businesses in SMDC	3,000	Postal
General postcard	All registered consultees on the planning policy database with no email address	2,900	Postal
General postcard	All registered consultees on the planning policy database with an email address	1,700	Postal

Table 4.1 Consultation Details

**4.6** The following drop in sessions were held.

Location	Date	Time
Werrington Methodist Chapel	15th July 2015	4.00pm-8.00pm
Biddulph Town Hall	16th July 2015	4.00pm-8.00pm
Moorlands House Leek	21st July 2015	4.00pm-8.00pm
Guildhall Cheadle	24th July 2015	4.00pm-8.00pm
Kingsley Village Hall	28th July 2015	4.00pm-8.00pm
Blythe Bridge Village Hall	29th July 2015	4.00pm-8.00pm

Table 4.2 Details of Drop in Events

**4.7** A number of Parish Councils ran their own site allocations events

- Endon Parish Council - Sat 11th July 2015,
- Cheddleton Parish Council
- Cheddleton 25th July 2015
- Wetley Rocks - 22nd August 2015

## Level of Response and Summary of key Issues

**4.8** Over 5500 responses were received to the consultation. The majority of responses related to the sites options and development/infill boundaries and came from residents who were concerned about the impacts of development. Common concerns included:

- loss of countryside and/or Green Belt
- infrastructure constraints (highways, schools, health, utilities)
- highway safety
- ecological/environmental impacts
- over development harm to the character of the area
- Impact on residential amenity
- development/infill boundaries which were either too restrictive or not restrictive enough

#### 4.9 Responses were also received on:

- the open space proposals , which identified numerous potential sites for open space purposes
- the call for sites which identified further potential development sites
- the SHLAA, which either objective to the inclusion/omission of sites in the SHLAA or the site assessment.

The following petitions were also received:

Petition	No. of signatures
Cheadle objecting to development	1030
BD62 Biddulph objecting to development	89
WE033 Werrington objecting to development	9
WE040 Werrington objecting to development	27
WE041 Werrington objecting to development	27
Objecting to all sites	143
Objecting to all sites Bagnall	126
SB16 objecting to development	34
Bagnall infill boundary	90% of residents

**Table 4.3 Petitions Site Options Consultation**

How they were addressed

**4.10** The responses received were taken into consideration in the preparation of the Preferred Options Sites and Boundaries document. Not all the site options for future development were needed to meet the Districts development requirements. The sites identified in the consultation were to enable the consideration of alternative site options and the site options were refined into the Preferred Options Sites and Boundaries document following consideration of the consultation feedback, the evidence base and national policy and guidance.

**4.11** Appendix 3 provides a summary of the responses received and how they were addressed. It includes details of responses to each site, proposals regarding the development/infill boundaries, open space, town centres, site suggestions, and the SHLAA. It also includes a summary of the Parish Council workshops.

### Compliance with the Statement of Community Involvement

**4.12** The consultation met the requirements set out in the Council's Statement of Community Involvement. It involved notifying all contacts on the Council's consultation database, leaflets to every household and business, site notices, drop-in sessions, posters and social media. All information and supporting documentation was available on the Council's website and paper copies were in Council Offices and the local libraries.



## Preferred Options Sites and Boundaries Consultation 2016

## 5 Preferred Options Sites and Boundaries Consultation 2016

**5.1** The Preferred Options Sites and Boundaries consultation took place between 28th April 2016 and 13 June 2016. This equated to six weeks, plus two extra working days to account for the two Bank Holidays in May. It followed on from the 2015 Site Options consultation. It consulted on the Preferred Options for the new Local Plan in the following matters:

- Development requirements and distribution
- Proposed changes to the green belt boundary
- Housing allocations
- Employment allocations
- Mixed use allocations
- Retail allocations, town centre boundaries and retail frontages
- Visual and public open space designations
- Settlement and infill boundaries
- Gypsy and traveller site allocation
- Areas for potential infrastructure improvements

**5.2** The document contained details of the proposed options including illustrative maps of the settlements. It contained a list of questions asking for comments on individual proposals by settlements. It was accompanied by an assessment of potential gypsy and traveller sites, an Initial Sustainability Appraisal April 2016 and a number of supporting documents. Paper copies of the consultation documents and response forms were available. The flyer/poster summarised the key issues of the consultation.

### Who was consulted and how?

**5.3** As with the previous consultation the Council invited a large number of individuals, organisations and statutory bodies to comment on the consultation.

**5.4** The main elements of the consultation were as follows:

- details of the consultation was on the Council's website and the online portal
- drop-in sessions for the public to attend to discuss the proposals with planning officers. Maps and exhibition boards and the consultation documents were available. (See table below)
- media releases
- social media
- details of the consultation were sent to all contacts on the Councils' planning policy database, including statutory bodies (See table below)
- details of the consultation were to landowners of the sites identified in the document (where these were known)
- details of the consultation was given to Town and Parish Councils to enable them to forward information to residents
- leaflets regarding the consultation were sent to all households and businesses in the District (See table below)
- details of the consultation were on site notices placed next to all the proposed site options
- copies of the consultation document were available at the Council Offices in Leek, Biddulph Councils' Connect Town Hall in Biddulph, Cheadle Councils' connect Cheadle.

- copies of the consultation document and response forms were available in the local libraries. Leek Library, Biddulph Library, Cheadle Library, Werrington Library and Blythe Bridge Library.
- response forms were available
- posters displayed where documents were available

### 5.5 Details of the notifications

Consultation Material	Recipient	Number (approx)	Distribution
General postcard	All residents in SMDC	48,000	Postal
General postcard	All businesses in SMDC	3,000	Postal
General postcard	All registered consultees on the planning policy database with no email address	8,000	Postal
General postcard	All registered consultees on the planning policy database with an email address	5,000	Email

**Table 5.1 Consultation Details**

Location	Date	Time
Biddulph Town Hall	11th May 2016	5.00pm-8.00pm
Greatwood Community Hall Upper Tean	12th May 2016	5.00pm-8.00pm
Guildhall Cheadle	17th May 2016	5.00pm-8.00pm
Moorlands House Leek	18th May 2016	5.00pm-8.00pm
Cheddleton Community Centre	19th May 2016	5.00pm-8.00pm
Whiston Village Hall	25th May 2016	5.00pm-8.00pm
Endon Village Hall	27th May 2016	5.00pm-8.00pm

**Table 5.2 Details of Drop in Events**

**5.6** The locations of the drop ins differed from the previous consultation so as many settlements as possible were visited throughout the consultation process.

## Level of Response and Summary of Key Issues

**5.7** A total of 8603 individual responses were received by 2643 individuals and organisations.

### 5.8 Housing requirement responses

- 4 consultees supported the requirement of 320 homes per year. The main reasons given were that the evidence justified the increase in housing requirement from the 300 homes per year identified in the adopted Core Strategy and that this would support the delivery of affordable housing
- 8 consultees submitted general comments regarding the housing requirement. Several related to reserving the right to comment at a later date.
- 282 consultees objected because the housing requirement was too high. Reasons given included:
  - Empty properties should be used instead

- Rate of development is not sustainable
- Concern over loss of Green Belt and countryside
- The bottom of the OAN range should be used instead
- Previous objections have not been listened to
- Concerns regarding infrastructure constraints and impacts eg transport, schools, open space, health and flood risk
- Stoke-on-Trent should accommodate some of the housing need
- Safety and amenity concerns
- 10 consultees objected because the housing requirement was too low. Reasons given included:
  - The requirement does not meet the full OAN
  - Additional sites are available to support a higher requirement
  - Housing provides economic benefits such as increased spend in town centres
  - Housing can support the sustainability of settlements by supporting local services
  - The 2014 based projections should be used when available
  - The OAN assessment does not adequately address uplifts required to the demographic projections as a result of forecast employment growth
  - 320 homes per year does not support jobs growth and is not realistic
  - The Council has not demonstrated how the adverse impact of meeting a higher requirement would 'significantly and demonstrably outweigh the benefits' of not doing so, or how those needs would be met elsewhere in the Housing Market Area

#### 5.9 Employment land requirement responses:

- 1 comment in support of the employment land requirement of 35 ha
- 3 general comments relating to the need to protect employment sites, sites issues and the need to provide housing to support jobs
- 2 comments that the employment land requirement is too low, namely because the figure did not support the potential for growth and was not aspirational enough
- 238 comments stated that the employment land requirement was too high. Reasons given included:
  - Site related issues
  - There is an over-allocation in Biddulph
  - Over-supply of employment land in Leek
  - Employment land provision is not proportionate to housing growth in Cheadle and the Rural Areas
  - Modelling used to assess needs is out of date

**5.10** Many of the consultation responses were in relation to the proposed development sites and were from residents. The main areas of concern were regarding the impacts of the development. Common concerns included:

- Loss of countryside and/or Green Belt
- Infrastructure constraints (highways, schools, health, utilities)
- Highway safety, access
- Ecological/environmental concerns

- Over-development/harm to the character of the area
- Impact on residential amenity
- Development boundaries either too restrictive or not restrictive enough

**5.11** Nine petitions were also received

<b>Petition</b>	<b>No. of signatures</b>
Save the Mount Leek	1092
Against the proposed site Kingsley	184
Against the development of Akesmore Lane Biddulph	450
Against the Travellers site Forsbrook Parish Council	1450
Checkley (non) Travellers site	222
Against housing Newpool Road Knypersley Biddulph	883
Against development adj to Knypersley Hall Biddulph	114
Support for ADD03 (from Biddulph north residents)	361
Cheadle SOuth West Housing and lack of open space	952

**Table 5.3 Petitions**

## How they were addressed

**5.12** The responses received were taken into consideration in the preparation of the Preferred Options document.

**5.13** A summary of the responses received and how they were addressed. It includes details of responses to each site, a summary of the responses to each of the 41 questions in the consultation is in appendix 4.

## Compliance with the Statement of Community Involvement

**5.14** The consultation met the requirements set out in the Council's Statement of Community Involvement. It involved notifying all contacts on the Council's consultation database, leaflets to every household and business, site notices, drop-in sessions, posters and social media. All information and supporting documentation was available on the Council's website and paper copies were in Council Offices and local libraries.

## Preferred Options Consultation 2017

## **6 Preferred Options Consultation 2017**

**6.1** There is a Separate Consultation Statement regarding the Preferred Options 2017 consultation.

## Sustainability Appraisal



## 7 Sustainability Appraisal

**7.1** This Sustainability Appraisal Report has been published to accompany the Staffordshire Moorlands Local Plan Submission Version February 2018. Sustainability Appraisal (SA) is an ongoing process.

**7.2** Consultation with the public, stakeholders and the SEA bodies on the SA Scoping, Initial and draft SA reports has been carried out alongside consultation on the emerging Local Plan.

**7.3** Details of the consultation undertaken, responses received and the action taken as a consequence are in section 14 of the Sustainability Report February 2018.