

Staffordshire Moorlands Local Plan – Schedule of Additional Modifications September 2020

Mod No.	Page	Para/Policy Number	Proposed Modification (deleted text has strikethrough, new text is <u>underlined</u>)	Reasons
AM1	Front cover	Front page	Amend document title: Staffordshire Moorlands Local Plan Submission Version <u>February 2018 Adopted</u>	Consequential amendment to front cover to reflect subsequent adoption of document.
AM2	All pages	Whole document	<u>Amend page headers:</u> Staffordshire Moorlands Local Plan – Submission <u>Version</u>	Consequential amendment to reflect subsequent adoption of document.
AM3	All pages	Whole document	<u>Amend page footers:</u> February 2018 <u>[insert year and month adoption]</u>	Consequential amendment to reflect subsequent adoption of document.
AM4	7	1.5	This Submission Version Local Plan is the (final draft) review of the Core Strategy and its policies. Once the new Local Plan has been through examination and is adopted, it will and <u>supersedes</u> the Core Strategy.	Consequential amendment to reflect subsequent adoption of document.
AM5	Various	All 'Consistency with Core Strategy' boxes following policies (Various)	All 'Consistency with Core Strategy' boxes to be deleted following adoption of the Local Plan.	To update Local Plan following adoption (superseding of Core Strategy).
AM6	Various	Various	Consequential re-numbering of and cross references to sections, chapters, appendices, paragraphs, tables and figures throughout the Local Plan to reflect other modifications such as the insertion of new paragraphs (e.g. between 8.105 and 8.106) ,the deletion of Chapter 2 and deletion of appendices 1-6.	Consequential amendments.

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AM7	7	1.6	<p>Statutory Period for Representations on the Submission Version Local Plan</p> <p>This is a statutory stage in the Local Plan process where the Council publishes its final draft of the Local Plan, the 'Submission Version' and invites comments on the soundness and legal compliance of its content during a 6 week period. <u>This took place between 27th February and 11th April 2018.</u> All representations received at this stage will be <u>were forwarded</u> on <u>'submitted'</u> to the Secretary of State alongside the Submission Version Local Plan. The 'submission' of these (and other relevant) documents is anticipated to take place in June 2018. Those objectors from the statutory period for representations had <u>will have</u> the right to be heard at an examination in public either in writing (written representations) or verbally at a hearing session conducted by an independent inspector appointed by the Secretary of State. Both methods carry equal weight. It is anticipated that <u>The examination hearings will begin in September</u> took place in October 2018 and February 2020</p>	To update references throughout the Plan, and clarify the difference between examination hearings, and the wider examination process, in response to the Inspector's preliminary questions.
AM8	7	1.8 (bullet list)	<ul style="list-style-type: none"> • Strategic Housing Market Assessment (SHMA) (2014) and Update (2017) • Employment Land Study (2014) and Update (2017) • <u>Sustainability Appraisal Report (Submission version Local Plan) (2018)</u> • Updated Gypsy and Traveller Needs Assessment (2015) • Retail Study (2013) • Retail Impact Assessment Thresholds Review (2017) 	To include reference to the Sustainability Appraisal as part of the evidence base in response to the Inspector's preliminary questions.

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			<ul style="list-style-type: none"> • Level 1 Strategic Flood Risk Assessment Update (SFRA) (2015) • Ecological Studies (2015, 2016 and 2017) • Cheadle Town Centre Transport Study (2015) and Phase 2 Assessment (2017) • Green Belt Review (2015) and Updates (2016 and 2017) • Strategic Housing Land Availability Assessment (SHLAA) (2015) • Green Infrastructure Strategy (2017) • Open Space Update Report and Standards Paper (2017) • Playing Pitch Strategy (2017) • Development Capacity, Viability and Community Infrastructure Levy Study (2018) • Infrastructure Delivery Plan (2018) • Habitats Regulations Assessment of Submission Version Local Plan (2018) • Landscape, Local Green Space and Heritage Impact Assessment (2016 and 2017) 	
AM9	9	1.12	<p>Once adopted, The new adopted Local Plan <u>will</u> forms part of the statutory Development Plan setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. Decisions on planning applications are required to be made in accordance with the Development Plan unless material considerations indicate otherwise. The material considerations could include national planning policy or significant local issues that have arisen since the Development Plan was prepared. <u>The Local</u></p>	For clarity and in response to the Inspector's preliminary questions.

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			<u>Plan Policies Maps replaced the previous policies maps attached to the 1998 Local Plan.</u>	
AM10	9	1.14	Following the adoption of the new Local Plan, The statutory Development Plan for the Staffordshire Moorlands outside of the Peak District National Park will now consists of:	Consequential amendment to reflect subsequent adoption of the Local Plan.
AM11	9	1.18	The NPPF (<u>National Planning Policy Framework</u>) also sets out policy in respect of minerals and waste to ensure that minerals of local and national importance are not needlessly sterilised by non-mineral development and that waste is appropriately managed. It also requires the prior extraction of minerals to be considered in these areas where practicable and feasible, if it is necessary for non-mineral development to take place.	For clarity and in response to the Inspector's preliminary questions.
AM12	10	1.22	There are currently six <u>eight</u> "Neighbourhood Areas" in which Neighbourhood Plans are being prepared in the District: Biddulph Brown Edge Checkley <u>Forsbrook</u> <u>Leek</u> Leekfrith Draycott-in-the-Moors Rushton	To ensure the most up to date information on neighbourhood planning and in response to the Inspector's preliminary questions.
AM13	10	1.23	Delete paragraph: Two other areas have expressed an interest in producing a Neighbourhood Plan and are due to formalise their neighbourhood areas. They are Forsbrook and Leek.	To ensure the most up to date information on neighbourhood planning and in response to the Inspector's preliminary questions.

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AM14	10	New paragraph after para 1.23	<p><u>Supplementary Planning Documents</u></p> <p><u>In addition to the Development Plan Supplementary Planning Documents (SPDs) also provide further guidance and background details to support the implementation of policies.</u></p> <p><u>They include:</u></p> <ul style="list-style-type: none"> • <u>Developer Contributions SPD (to be updated)</u> • <u>Design Guide SPD (adopted 2018)</u> • <u>Churnet Valley Master Plan SPD (adopted 2014)</u> • <u>Leek Town Centre Master Plan SPD (adopted 2014)</u> • <u>Cheadle Town Centre Master Plan SPD (adopted 2014)</u> 	To clarify the SPDs that will supplement the Local Plan in response to the Inspector's preliminary questions.
AM15	11	Para 1.27	Another key element of the NPPF are the "tests of soundness". These tests will ultimately be <u>were</u> applied by the a Planning Inspector when the Local Plan is being <u>was</u> under <u>examined</u> <u>examination</u> . The Local Plan (as modified) <u>must be</u> was deemed to have met all of the tests in order for it to be adopted. The tests are that the Local Plan must be:	Consequential amendment following adoption of the Local Plan.
AM16	12	New paragraph after para 1.27	<u>Note that for clarification this Local Plan has been prepared and examined under the transitional arrangements of the 2012 NPPF, consequently references made throughout the document to the NPPF refer to the 2012 version. Planning applications will be determined in accordance with the development plan unless material considerations determine otherwise. The most recent version of the NPPF is a material planning consideration in the determination of planning applications.</u>	For clarity given the transitional arrangements applicable to the 2012 NPPF and more recently published versions.
AM17	12	Para 1.30	The Housing White Paper published in February 2017 sets	Update to supporting text for

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			out a number of potential policy changes and information relating to the provision of housing, design and Green Belt amongst others. However, the final outcome of consultation on the White Paper is awaited. <u>The Government published its response to White Paper consultation responses in March 2018.</u> The Self-Build and Custom House Building Act 2015 and associated Regulations (2016) introduced a new requirement for the District Council to maintain a register of individuals and associations of individuals who are seeking to acquire a plot of land to provide their own home. Councils are then required to have regard to the register in carrying out their planning and regeneration functions. The Regulations require that sufficient land is granted planning consent to meet the demand on the register within three years.	clarity.
AM18	12	Para 1.31	The Town and Country Planning (Brownfield Land Register) Regulations 2017 make provisions for Councils to maintain a register of brownfield sites that are suitable for residential development irrespective of their planning status. The District Council's register was <u>first published in December 2017 and updated annually,</u> and can be found on its website. Sites identified in Local Plans may be included on the register alongside others that are considered suitable for development. Permission in Principle (PiP) may then be granted for some sites on the register.	Update to supporting text for clarity.
AM19	15	Para 1.45	To date, in order to satisfy the duty to co-operate, Staffordshire Moorlands District Council has engaged <u>with</u> authorities including Staffordshire County Council, Stoke-on-Trent City Council, Newcastle-under-Lyme Borough Council, Stafford Borough Council, the Peak District National Park Authority, Cheshire East Council, High Peak District <u>Borough</u>	Factual corrections.

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			Council, Derbyshire Dales District Council and East Staffordshire <u>Borough</u> Council. Strategic issues that have been identified to date include:	
AM20	15	Para 1.47	This Local Plan Submission Version document is supported by a Sustainability Appraisal. The appraisal has helped to inform the content of the Local Plan. The Sustainability Appraisal <u>was</u> itself is also subject to public consultation alongside the Local Plan <u>during the examination process</u> . If you wish to read and comment on the Sustainability Appraisal, you may find further details at Council offices and online: www.staffsmoorlands.gov.uk/localplan .	Consequential amendment following adoption of the Local Plan.
AM21	15	Para 1.48	An Equalities Impact Assessment has also been undertaken to consider how the Local Plan may impact upon different groups within the community. A Habitats Regulations Assessment is has also been prepared. With the recommended mitigation measures, the report concludes that the Submission Local Plan will not result in adverse effects on European sites, both alone and in combination with growth in neighbouring areas. These documents are also available to view at Council offices and on the Council's website.	Grammatical correction.
AM22	17-18	Section 2 How to Respond	Section to be deleted following adoption of Plan.	Consequential amendment following adoption of the Local Plan.
AM23	24	Cheadle box	Cheadle (pop. 12,165) is the smallest town, located 10 miles south east of Leek and 10 miles west <u>east</u> of the north Staffordshire conurbation and serving a more limited catchment area. Cheadle has suffered from under-investment and a poor infrastructure and its town centre has declined in recent years but a successful Heritage Economic	Factual correction.

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			Regeneration Scheme has led to some improvements. Whilst the town has some notable buildings, including the precious asset of St. Giles' RC Church, one of the finest works of the celebrated Victorian architect A W Pugin, the majority of its houses have been built since the First World War. Cheadle is only 4 miles from the A50 [T] Stoke to Derby road that links the M1 and M6 motorways.	
AM24	27-28	Improving the housing market box under para 4.1	Amend 2 nd bullet as follows: There is a need to re-balance the housing stock <u>for example a need for more terraced properties and more rental sector properties</u> away from smaller terraced properties towards <u>and</u> better quality, aspirational properties to reduce the levels of net out-migration to neighbouring areas. There is also a need for accommodation to support a <u>growing elderly population</u> .	To make this para consistent with evidence and other references in the Plan in response to the Inspector's preliminary questions.
AM25	48	Para 7.20	The NPPF requires that authorities meet the full, objectively assessed needs for market and affordable housing. The 2014 Strategic Housing Market Assessment (SHMA) assessed the extent of the local housing market and its characteristics and provided an assessment of the need for market and affordable housing. It was updated in 2017 <u>to</u> take account of the 2014 based Sub-National Household Projections and new employment projections. The 2017 SHMA update concluded that the housing needs of the District lie within the range of 235 to 330 additional homes per year up to 2031. The top of the range relates to the level of housing growth required to support potential employment growth, whilst the bottom reflects household projections. The latter would lead to a decline in the number of jobs in the District due to a decline in the working age population.	Grammatical correction.

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AM26	52	Para 7.32	The Housing Trajectory (Appendix 7 <u>1</u>) indicates how the Council expects future provision to come forward.	Consequential amendments to reflect the deletion of appendices 1-6
AM27	54	Para 7.39 Third sentence	A methodology for calculating future requirements is provided at Appendix 11 <u>5</u> .	Consequential amendments to reflect the deletion of appendices 1-6
AM28	56	Policy SS4	Neighbourhood Plans section. The methodology used to calculate the housing requirement is set out in Appendix 11 <u>5</u> and will be used to calculate requirements for new Neighbourhood Plans.	Consequential amendments to reflect the deletion of appendices 1-6
AM29	62	Para 7.51	The identification of sites and proposals for improved or new recreational and sports facilities and for additional or improved educational and health facilities and services <u>have been considered by the various evidence base studies</u> will emerge from current studies being undertaken and through on-going discussions with service providers will continue.	For clarity.
AM30	65	Para 7.54	One of the most significant challenges is identifying the need <u>for</u> and viability of a link road to relieve through traffic in the town and provide improved access to existing and planned housing and employment areas.	For clarity in response to LPS85.
AM31	65	Para 7.55	A further significant challenge is the need for more community facilities to serve a growing population. The County Council has identified the need for a new primary school to serve the north of the town. An updated Open Space Sports and Recreation Study <u>and Playing Pitch Strategy</u> considers the will identify potential needs for new <u>and improved provision</u> facilities across the town.	For clarity and factual change
AM32	71	Para 7.61	Development on a large scale would be unsustainable in	For clarity.

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			these villages, as it is will generate a disproportionate number of additional journeys outside the village and may undermine the spatial strategy. Development will be strictly controlled in order to ensure that the character and life of the settlement is not undermined. Boundaries are not defined for smaller villages <u>however, some are set within the Green Belt by virtue of the alignment of the Green Belt boundary.</u> , except where they have been excluded from the Green Belt. Limited development, including infill will be supported subject to this policy and Green Belt policy set out in the National Planning Policy Framework.	
AM33	80	SS11 Churnet Valley Strategy	Delete last sentence: Development shall be in accordance with the Churnet Valley Masterplan.	Delete superfluous reference (already contained in first para) in response to inspector's preliminary questions. Grammatical correction and outcome of examination hearing session 12 - Infrastructure, Planning Obligations and Delivery.
AM34	83	Para 7.78	The following Key Diagram illustrates key constraints, opportunities and proposals across the District. It is intended to provide a visual representation of the Spatial Strategy and issues that have helpful <u>helped</u> to shape it. More detailed maps of proposals are provided in the policies map Appendices to this Local Plan.	Grammatical correction. The maps are shown on the policies map and are no longer in the appendix.
AM35	85	Para 8.2	These policies should be read in the context of the Spatial	Grammatical correction and

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			Strategy and Strategic Policies in the preceding chapter of this Local Plan. In addition, further site specific policies are provided in Chapter 9 <u>8</u> .	consequential change following deletion of How to respond Chapter.
AM36	86	Para 8.6	Government Policy states that Councils should take into account the economic and other benefits of the best and most versatile (BMV) agricultural land with a preference for development of areas of poorer quality land over those of a higher quality. The Council has used the Natural England <u>likelihood</u> of Best and Most Versatile dataset and this formed part of site assessments against the sustainability appraisal framework. Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important that soils are protected and used sustainably. Development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. However soil protection needs to be balanced against other Council policies which for example expect demonstration of appropriate housing density for its location, with higher densities expected in more accessible locations, to encourage more sustainable patterns of development. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity. Developers should refer to the Defra Code of practice for the sustainable use of soils on construction sites.	Grammatical correction. (Dataset does relate to 'likelihood of' best and most versatile agricultural land). (In response to inspector's preliminary questions).
AM37	86	Para 8.7	The submission of environmental information listed in Part (4) <u>(5)</u> SD1 for major developments (broadly as defined in the	Factual correction in response to inspector's

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			Development Management Procedure Order) will enable the Council and applicant to explore how they can further contribute towards improving a scheme in relation to climate change/carbon-saving in the context of the viability expectations of the NPPF. Such information may be submitted as part of a Design and Access Statement or separately. Where the Council considers insufficient information has been submitted given the complexity of the proposal, it may request further information to cover the expectations regarding this part of the Policy.	preliminary questions.
AM38	89	Para 8.12	In line with National Policy, Policy SD2 gives support to new renewable energy development generally without differentiating between forms, as the District has natural characteristics (e.g. river flows) which could make this viable – either now, or due to future technology. In the case of wind energy proposals, the Policy clarifies that recent Government NPPG Policy (in particular Ministerial Statement HCWS42) will be applied, as the Local Plan does not currently designate any "areas identified as suitable for wind energy development". Policy SD2 also recognises that the siting and design of all stand-alone renewables installations requires careful consideration, to protect the natural and built environment, and other amenities, without precluding the supply of any type of renewable energy. Renewables schemes can also impact upon heritage assets such as Listed Buildings; it is understood Historic England are preparing an Advice Note, which developers should review where appropriate. The viability of different forms of renewable energies, within different areas of the District, is examined in the CAMCO work (which may in future be	Grammatical correction.

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			informed by further local evidence). Note that schemes for non-renewable energy schemes not covered by this policy (such as fossil fuel generators), will be assessed against all relevant policy, including the National Policy Statements.	
AM39	90	Para 8.13	A consequence of recent Governments' commitment to mitigating climate change has been a tightening of the building regulations with respect to environmental performance of new dwellings (including thermal efficiency/ water consumption efficiency/ minimisation of surface water run-off etc), according to a trajectory aimed at attaining "zero carbon" status for new dwellings, by 2016 <u>(though this trajectory was subsequently cancelled in July 2015 as part of the Government's Productivity Plan: Fixing the Foundations: Creating a More Prosperous Nation)</u> . Previously under the Planning and Energy Act 2008, Councils could set policy requirements that exceeded building regulations; however the Deregulation Act 2015 has since removed this power, as part of the Government's intention to streamline housebuilding standards and remove financial viabilities upon developers. The NPPF is clear in its support for reducing the carbon- and water- consumption impacts of new buildings, but, because this generally involves greater build-costs, this is subject to developer viability considerations. The Government has recently introduced a number of optional 'national technical standards' pertaining to access, space, and water efficiency in new dwellings (Councils can only apply a requirement for these in policy if justified by 'clear evidence'). There are also a number of other voluntary schemes such as BREEAM 'Home Quality Mark', and the UK New Construction Standard (for non-domestic buildings) which builders can refer to.	To correct out of date information.

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AM40	91	Policy SD 3 Sustainability Measures in Development	<p>Amend policy as follows:</p> <p>The Council will support further carbon-saving or water-saving measures in both new and existing developments, in the following ways:</p> <ol style="list-style-type: none"> 1. Supporting developers who propose exceeding the thermal efficiency or water conservation standards required by law for new buildings or extensions, at the time of the application. In the case of larger developments such as housing estates the Council will support measures such as ‘communal’ micro-renewables, or District Heating installations. 2. The Council will support measures by landowners/developers designed to contribute to existing or emerging District Heating networks (for example by connecting ‘exporters’, with receptors, of heat). 3. The Council will support measures designed to improve the sustainability of existing buildings (such as improved thermal insulation, water conservation, or the installation of micro-renewables). 	For clarity in response to LPS242.
AM41	92	Para 8.20	<p>Groundwater is a vital resource supplying about a third of the Country's drinking water, however is often under threat from development pressures. In order to protect the quality of this water resource the policy also sets out expectations concerning risk assessments and mitigation strategies with schemes. Other Policy requirements continue to apply, eg SD5, with regards SuDS requirements, green infrastructure etc. <u>More detailed guidance regarding groundwater mitigation</u></p>	To provide reference to the Groundwater Protection Guides.

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			<p><u>strategies etc is available in the Groundwater Protection Guides at Gov.uk (or any subsequent iteration of guidance on development in Groundwater Protection Zones). Early consultation with the Environment Agency and the relevant water company is also encouraged.</u></p>	
AM42	92	SD4 Pollution and Water Quality	<p>Amend policy as follows:</p> <p>The Council will protect people and the environment from unsafe, unhealthy and polluted environments by ensuring proposals avoid potential adverse effects; and only permitting proposals that are deemed (individually or cumulatively) to result in pollution (including air/ water/ noise/ vibration/ light/ ground contamination) if after mitigation, potential adverse effects are deemed acceptable. This may be achieved by the imposition of planning conditions or through a planning obligation.</p> <p>When considering planning applications, the Council will require developers to have regard to the actions and objectives of all relevant River Basin Management Plans and related Plans affecting the District in striving to protect and improve the quality and capacity of water bodies in or adjacent to the District. Planning permission shall only be granted where the proposal makes provision for the protection (and where feasible, enhancement) for <u>of</u> water quality and waterside habitat, and water resources where applicable.</p> <p>In the case of development within Groundwater Source Protection Zones (SPZs) applicants should demonstrate how</p>	Grammatical correction.

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			site layout has sought to mitigate potential pollution to public water supply. A quantitative and qualitative risk assessment and groundwater protection mitigation strategy may be required subject to consultation with relevant bodies.	
AM43	93	8.21	The Moorlands has a wet climate and within it there are significant corridors along rivers identified as being within flood risk zones, in addition to other areas affected by surface water run off. Previous consultations have indicated acute public concerns to <u>about</u> flooding generally. Development patterns can have distorting effects on the water cycle and drainage systems (for example, artificial features such as hardstanding, new roads and pavements can create channels of surface run-off). Further, Climate change can be seen to result in more flooding and more unpredictable weather patterns generally; and also water scarcity issues. Therefore the NPPF expects that all new development proposals should be planned to avoid increased vulnerability to the range of impacts arising from climate change in the longer term; which should include mitigation and adaptation measures for the increased risk.	Grammatical correction.
AM44	93	Para 8.22	The District Council will continue to keep abreast of relevant evidence affecting flood risk in its District, such as the requirements of the Flood & Water Management Act 2010, Humber River Basin District Management Plan, Staffordshire Local Flood Risk Management Strategy, Water Framework Directive and any other relevant Catchment Flood Management Plans. A level 1 Strategic Flood Risk Assessment has been undertaken for the District. In accordance with the NPPF, areas of 'low', 'medium' and 'high' risk have been mapped using data collected from the	To explain abbreviated terms used later on in the Plan text in response to inspector's preliminary questions. Grammatical correction

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			<p>Environment Agency (<u>EA</u>), Staffordshire Moorlands District Council, Severn Trent Water, United Utilities, the Highways Agency and British Waterways. This has included information on flooding from rivers, surface water (land drainage), groundwater, artificial water bodies and sewers. This provides the basis for the Sequential Test to be applied. The Council will expect the Sequential Test to be applied to all sites within the ‘high’ and ‘medium’ risk flood zones to demonstrate that there are no reasonably available sites in areas with less risk of flooding that would be appropriate to the type of development or land use proposed. If there is an area of overlap between the site boundary and area at risk of flooding, this should be utilised as an opportunity to reduce flood risk within the site, by using waterside areas for recreation, amenity and environmental purposes. Where sites are affected by the presence of any type of watercourse, the Council will expect developers to undertake early discussions with the Environment Agency <u>EA</u> and the Lead Local Flood Authority (<u>LLFA</u>). The NPPF provides guidance on the types of development which require the submission of a site-specific flood risk assessment; which should demonstrate that the development has been designed to be flood resilient and resistant and safe for its users for the lifetime of the development; that the development will not increase flood risk elsewhere and, wherever possible, will reduce overall flood risk.</p>	
AM45	94	Para 8.24	<p>Where possible, watercourses should not be culverted, as this can impede water flows and worsen flooding. Culverting also impacts on the ecological health of the watercourse.</p>	<p>To explain abbreviated terms used later on in the Plan text in response to</p>

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			<p>Proposals for culverting a watercourse may trigger a <u>Water Framework Directive (WFD)</u> assessment. Crossings of water courses should be made where possible by a bank top to bank top bridge system in preference to culverts. <u>The Council</u> expects developers to explore how existing culverted watercourses on site can be 'opened up' to alleviate flood risk, create and improve habitat and develop green corridors. Where this is not possible for larger, deeper culverts, an assessment of its structural integrity should be made, with any remedial actions taken prior to the development of the site. In addition, a maintenance regime should be agreed to reduce the likelihood of blockage.</p>	<p>inspector's preliminary questions.</p>
AM46	94	Para 8.25	<p>This Policy <u>SD5</u> is designed to limit the impact of surface water flooding from new development. The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. Applicants should target a reduction in surface water discharge in accordance with DEFRA and LLFA guidance. Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. On previously developed (brownfield) sites the aim should be to reduce runoff rates and volumes. On greenfield sites the aim should be to ensure that there is no increase in the rate and volume of surface water runoff. Surface water from new development should be discharged in the following order of priority:</p>	<p>For clarity in response to inspector's preliminary questions.</p>

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			<p>1. An adequate soakaway or some other form of Sustainable Drainage System (eg pond,swale,wetland etc).</p> <p>2. An attenuated discharge to watercourse.</p> <p>3. An attenuated discharge to public surface water sewer <u>or highway drain</u>.</p> <p>4. An attenuated discharge to public combined sewer.</p>	
AM47	95	Para 8.26	<p>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On larger sites drainage proposals should be part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction; the Council will encourage applicants to engage in early discussion with utility providers and LLFA for this purpose.</p>	To delete repetition from para 8.25.
AM48	95	Para 8.27	<p>Notwithstanding any requirements for site-specific flood risk assessments, new legislation (2010 Flood and Water Management Act) may require separate Sustainable Drainage approval from the SuDS-approving authority (in all locations) for most new developments. In December 2014, a written ministerial statement by Eric Pickles MP clarified that the Government expects Planning Authorities to ensure that sustainable drainage systems for the management of run-off are put in place for all ‘major’-scale developments, unless demonstrated to be inappropriate; and that there are clear arrangements in place for ongoing maintenance over the</p>	<p>Insertion of hyperlink to SCC ‘Information for Planners and Developers’ webpage in response to LPS229.</p> <p>Clarification that the ‘Updated Map for Surface Water’ has been superseded by the ‘Risk of Flooding from Surface Water map’ (LPS253).</p>

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			<p>lifetime of the development. SuDS can include permeable surfaces, green roofs, filter strips and swales, infiltration devices and basins or ponds. Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management. The preference will be for new development to include genuine sustainable drainage systems as opposed to underground tanked storage for surface water. Applicants should also consider how the landscaping of a site can contribute to surface water discharge (hard and soft landscaping, permeable surfaces etc). Development proposals should include an indicative drainage strategy to demonstrate how sustainable drainage will be incorporated into the development. The strategy should include sustainable drainage elements with attenuation, storage and treatment capacities incorporated as set out in (updated) national design guidance. Applicants will also be expected to review any guidance issued by the County Council Lead Local Flood Risk Officer or Environment Agency, with regards to SuDS design expectations, as appropriate including Staffordshire County Council’s February 2017 ‘SuDS Handbook’ ;<u>and the SCC SuDS information page for developers</u> at https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx . Additionally as the Moorlands is hilly, developers should also consider the issue of ‘peri-urban flooding’ in their surface water/SuDS strategies: where water on land uphill of a site ‘sheds off’ down into the development. The Updated Flood Map for Surface Water Risk of Flooding from Surface Water</p>	

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			<u>map</u> gives a good indication of where problems might arise and developers should consider this potential risk carefully in hilly areas of the District such as Biddulph and Leek. Early pre-application consultation with the LLFA on these risks is advised.	
AM49	97	Para 8.28	The provision of employment land of the right type and in the right place is a key issue for the Local Plan. The Employment Land Study has highlighted the need for the local economy to rely less on the manufacturing industry and to stimulate the private sector by making more sites available. The Study particularly indicated the need for starter units and the potential for offices. Tourism and cultural development is also seen in the Employment Land Study as being potentially significant for the District's economy in terms of generating income and providing employment. This section therefore contains 5 policies to help develop the District's economy and maintain existing valuable employment land and premises. Note that The allocation of Blythe Vale for mixed uses under Policy DSR1 responds to a unique set of circumstances as it is of regional-scale; a more flexible approach to mixed uses is advocated under Policy DSR1 than in this <u>Policy E1</u> .	For clarity.
AM50	102	Para 8.38	Amend first sentence: The Council will continue to resist proposals involving the loss of employment land <u>or employment use</u> (as defined in the Glossary) by proposing a sequential approach towards planning applications.	In response to the Inspector's preliminary comments that whilst employment land was defined in the Glossary and linked to this Policy, 'employment uses' was not. To clarify that Policy covers both employment land and

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				employment uses.
AM51	104	Para 8.42	This <u>Policy E4</u> positively supports the important role that tourism and culture plays in the economy of the Staffordshire Moorlands and the contribution it makes to increasing physical activity and improving health and well-being. The District benefits from natural attributes including its landscapes, the Churnet River etc alongside man-made features including industrial heritage; prominent examples being the Caldon Canal; heritage railway system, reservoirs such as Rudyard and Tittesworth, and quarry workings. It is essential however that all new tourism, visitor and cultural proposals that are located outside settlement boundaries should be in sustainable locations and carefully assessed so that they do not have a detrimental impact on the local area unless it can be demonstrated that a particular tourism proposal requires such a location. The policy also accords with the Strategic Policies and tourism policy for the Churnet Valley (Policy SS11) which seeks to promote the Churnet Valley as a sustainable tourism and recreational resource.	For clarity.
AM52	105	Para 8.43	Existing tourist accommodation in the Staffordshire Moorlands is generally small scale family-run businesses, usually rurally located, often in converted buildings. The area has a relatively high proportion of self-catering types of accommodation and very few hotels and serviced accommodation. At present a very low proportion of visitors to the Moorlands stay overnight <u>in serviced accommodation</u> and supply is particularly low in the three towns. Within the Churnet Valley the provision of further short and long stay visitor accommodation is particularly supported, the Churnet Valley Masterplan provides further guidance on suitable sites	For clarity in response to inspector's preliminary questions.

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			<p>and scale. Particular attention should be paid to the quality of new tourist accommodation. A Staffordshire Moorlands Tourism Study undertaken in 2011 has identified a number of projects that would enhance the tourism offer of the District. These include developing and improving attractions and attractors, and enhancing the accommodation stock, notably further small serviced and self catering accommodation, particularly in the Churnet Valley, and providing budget hotel accommodation in the market towns. Tourism also plays an important role in diversifying the rural economy. The Tourism Study identifies where there is scope for further provision and the nature of that provision which will help inform decisions on applications for tourism uses in order to ensure supply matches demand. Policy E4 sets out the considerations for tourism proposals.</p>	
AM53	105	Para 8.44	<p>Within town centres new tourism, visitor and cultural facilities and accommodation should accord with Policy TCR1. Outside settlement boundaries (beyond areas with good connectivity with other tourist destinations and amenities), and in areas not identified for tourism development in the Churnet Valley Masterplan or other relevant documents, <u>proposals for new tourist, visitor and cultural accommodation and facilities will be limited to the conversion of existing buildings and in exceptional circumstances new buildings will need to justify their location as well as the need for the facility.</u> <u>Sites Proposals</u> for touring caravans and camping sites will be granted providing they meet the criteria set out in <u>also need to satisfy the terms of</u> the policy. Stronger controls will however apply across the Green Belt, including those parts of the Churnet Valley which are within it, in order to preserve their</p>	<p>For clarity - to remove inaccurate reference to rural building conversions. Also the reference to caravans and camping sites relates to an earlier version of the Plan and needs to be updated. (In response to inspector's preliminary questions). Also textual amendments to reflect main modifications to Policy E4 (MM21).</p>

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			openness.	
AM54	111	Para 8.54	In order to meet the housing requirement outlined in Policy SS3 and Policy SS4, the above sites <u>below</u> have been identified as suitable for development. In some cases this will be housing but in others the site may be more suitable for a mix of uses.	For clarity.
AM55	115	Para 8.62	This policy is based on the 2015 'Planning Policy for Traveller Sites' Guidance and wider NPPG, which seek to address this through criteria aimed at ensuring such provision is made in appropriate locations which will apply to the determination of planning applications. This policy also relates to travelling showpeople. Although their work is of a mobile nature, showpeople nevertheless require secure, permanent bases for the storage of their equipment and more particularly for residential purposes.	For clarity.
AM56	126	8.84	Ten <u>eight</u> of the designated Conservation Areas have adopted character appraisals	Factual correction
AM57	131	Para 8.96 Last sentence	Their location can be viewed on the policies maps and a full list can be found in Appendix 4 <u>4</u> .	Consequential amendments to reflect the deletion of appendices 1-6
AM58	131	Policy DC4	The Council has identified and will protect from inappropriate development Local Green Space shown on the policies maps and listed in Appendix 4 <u>4</u> .	Consequential amendments to reflect the deletion of appendices 1-6
AM59	137	Para 8.106	Green Infrastructure is the network of green spaces and natural elements that intersperse <u>lie within</u> and connect our towns, villages and countryside. It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside.	Textual amendment in response to inspector's preliminary questions.

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AM60	140	Para 8.114	<p>The Staffordshire Moorlands Biodiversity Opportunity Map has been produced by Staffordshire Wildlife Trust in conjunction with other nature conservation bodies which to <u>highlights</u> areas of biodiversity importance. This and other evidence has contributed to the preparation of a Strategic Green Infrastructure network for the Plan Area which identifies a series of strategic corridors designed to link existing (and proposed) green spaces with green corridors running through towns, villages and rural areas. The Map and associated objectives are published as part of the Council's Green Infrastructure Strategy.</p>	For clarity
AM61	144 /147	Para 8.125 / para 8.134	<p>Amend para 8.125:</p> <p>It is considered that there is potential in influencing modal shift away from the car in Staffordshire Moorlands in two respects - by targeting public transport improvements along the main corridors connecting the Moorlands with the Stoke-on-Trent conurbation; and by promoting walking, cycling and public transport within and between local settlements. <u>This will also help to support healthy, inclusive and sustainable communities as well as reducing the impacts of travel.</u> The Council's Development Capacity Studies have examined the accessibility of the main settlements in the District using the existing transport network including public transport and this has informed the development approach and identification of development areas. However, it is important that strategic planning decisions are not purely based on the location of existing sustainable transport infrastructure. For this reason the proposed policies are proactive in seeking improvements to the existing network.</p>	To avoid duplicatory text contained in both paras (in response to the Inspector's preliminary questions).

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			<p>Delete para 8.134:</p> <p>The high level of out-commuting in the District would also suggest there is potential in affecting modal shift away from the car in a number of ways - by targeting public transport improvements along the main 'work corridors' connecting the Moorlands with the conurbation; by promoting public transport schemes within rural areas / between rural areas and towns; and by facilitating walking and cycling within settlements. This will also help to support healthy, inclusive and sustainable communities as well as reducing the impacts of travel.</p>	
AM62	145	Para 8.130	<p>The Government issued a ministerial statement in 2015 which stated arbitrary parking standards that restrict off-street parking (such as maximum standards), should not be applied when assessing planning proposals, without compelling justification. Therefore, the Council will consider the appropriateness of proposed off-street parking in schemes, on a case by case basis, after (where appropriate) having consulted with SCC Highways Officer (and Manual for Streets (2007)/Manual for Streets 2(2010)), rather than referring to formally laid out standards. However the Council has, after consultation with SCC Highways Officer, published recent guidance to accompany this Local Plan which suggests 'minimum' provision of spaces, depending on use class; these are set out in Appendix & <u>2</u> of the Local Plan.</p>	Consequential amendments to reflect the deletion of appendices 1-6
AM63	146	Policy T1	<p>3. Considering appropriate parking provision on a case by case basis with recourse to the parking guidance set out in Appendix & <u>2</u>.</p>	Consequential amendments to reflect the deletion of appendices 1-6
AM64	151	Para 9.4	<p>A track in SCG ownership of <u>Churnet View Middle School</u></p>	Factual correction.

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			running to Wardle Barn Farm separates the Churnet View School from the Horsecroft Farm site. SCC Highways have indicated that access via this track is acceptable through the Nightingale Estate (Tittesworth Avenue), subject to access design. It is feasible that a mixed use scheme could be accessed either via the current SCC school track ; or using land at Horsecroft Farm instead. The Council would also view favourably proposals that consolidate the additional school land with the current school site, and consideration should be given to new alignment of this track to accommodate this.	
AM65	151	Para 9.8	The Extended Phase 1 Habitat Surveys and Local Wildlife Assessments also recommend a number of ecological surveys are undertaken (including survey of the peripheral hedgerow habitat to establish potential SBI (<u>Site of Biological Importance</u>)/BAS (<u>Biodiversity Alert Site</u>) status) and that any vegetation is removed at the appropriate time of year.	To explain abbreviated terms used in the Plan text in response to inspector's preliminary questions.
AM66	152	Policy DSL1	Development must	Grammatical correction to ensure consistency with MM36
AM67	153	Policy DSL2 First paragraph	Land amounting to approximately 10.62ha as shown on the proposals policies map is allocated for housing (approximately 345 dwellings); and 0.76 ha for D1 education.	Factual correction the maps are called the Policies Maps.
AM68	153	Policy DSL2 Second paragraph	Development must	Grammatical correction to ensure consistency with MM37
AM69	154	Policy DSL2 Third paragraph	Land for a new first school shall be safeguarded as identified on the proposals policies map, or similar location, if forming part of a mixed education and residential development.	Factual correction the maps are called the Policies Maps.
AM70	155	Policy DSL3	Development must	Grammatical correction to

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		Second paragraph		ensure consistency with MM38
AM71	157	Policy DSL4 Second paragraph	Development must	Grammatical correction to ensure consistency with MM39
AM72	161	Policy DSB1 second paragraph	comprehensive master planning	Grammatical correction
AM73	175	Para 9.97	The <u>site</u> is allocated for mixed-use which includes residential development of approximately 300 houses. This residential development should be located to the north of the site which is more closely related to the village of Blythe Bridge. The site has the capacity to deliver housing outside the Green Belt in a sustainable and accessible location. Housing development on the site may also help support the delivery of the employment uses by stimulating new investment. The National Planning Policy Framework (NPPF) is clear that Green Belt boundaries should only be altered in exceptional circumstances where plans are being prepared or revised. The Housing White Paper (February 2017) reaffirms the government's commitment to protecting and maintaining the Green Belt and states that Green Belt boundaries can only be amended when it can be demonstrated that all other reasonable options have been fully examined. The allocation of this site to include residential development is therefore considered important as it will enable the Council to meet its objectively assessed need for housing in line with the principles in the Spatial Strategy and to reduce the amount of land that will be required to be removed Green Belt.	Grammatical corrections.

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AM74	176	Para 9.103	Consideration also needs to be given to improving connectivity with surrounding areas both interns <u>in terms</u> of wildlife corridors and sustainable transport routes to Blythe Bridge and the wider transport network. It is important that there are sustainable transport links to the employment development on the site. A cycle path crosses the southern path <u>part</u> of the site and this should be retained to provide access to the surrounding area.	Grammatical corrections.
AM75	178	Para 9.109	The Council's Landscape, Local Green Space and Heritage Impact Study identifies a Listed building <u>Finneylane Farm</u> a short distance to the south and advises that despite intervening screening, development of the site would adversely affect its setting. It therefore recommends the site is only suitable for development in heritage terms, subject to suitable masterplanning and appropriate mitigation.	Factual correction.
AM76	179	Policy DSR2 second paragraph	Development must	Grammatical correction to ensure consistency with MM48
AM77	After page 184	Before text in MM52	<u>Anzio Camp</u>	To provide a title to the supporting text to the policy.
AM78	186	Para 10.1	The Local Plan is required to set out how much development is intended to happen, where and when and by what means it will be delivered. To enable this to happen, the plan should be: <ul style="list-style-type: none"> • Capable of being delivered • Based on a partnership approach that helps to implement the aims and objectives of partner 	Grammatical correction.

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			<ul style="list-style-type: none"> <u>organisations that benefit Staffordshire Moorlands</u> • organisations that benefit Staffordshire Moorlands • Flexible to reflect to changing circumstances, and have appropriate contingency measures <u>in place</u> • in place • Easy to monitor to determine how well the strategy is performing against indicators and targets 	
AM79	215- 270	Appendix 1-6	Delete appendices 1- 6	Consequential amendments to reflect subsequent adoption of the Local Plan. The Policies Maps will be a separate document.
AM80	Page 271	Appendix 7	Appendix 7 1 <u>1</u>	Consequential amendments to reflect the deletion of appendices 1-6
AM81	Page 273	Appendix 8	Appendix 8 2 <u>2</u>	Consequential amendments to reflect the deletion of appendices 1-6
AM82	Page 279	Appendix 9	Appendix 9 3 <u>3</u>	Consequential amendments to reflect the deletion of appendices 1-6
AM83	Page 283	Appendix 10	Appendix 10 4 <u>4</u>	Consequential amendments to reflect the deletion of appendices 1-6
AM84	Page 287	Appendix 11	Appendix 11 5 <u>5</u>	Consequential amendments to reflect the deletion of appendices 1-6
AM85	Page 293	Appendix 12	Appendix 12 6 <u>6</u>	Consequential amendments to reflect the deletion of

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				appendices 1-6
AM86	296	Glossary	Edge of centre - For retail purposes, a location that is well connected and up to 300 metres of of <u>from</u> the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.	Grammatical correction.
AM87	296	Glossary	Amend “Employment Land”: Employment Land/<u>Employment uses</u> – In the context of the Local Plan this includes authorised employment sites currently in use; disused/vacant sites where authorised employment use has not been abandoned; and employment allocations (Policy E2) whether or not they contain development.	For clarity - In response to the Inspector’s preliminary comments that whilst employment land was defined in the Glossary and linked to this Policy, ‘employment uses’ was not. To clarify that Policy covers both employment land and employment uses.
AM88	297	Glossary	Household Size – the average number of people in an area to be found in private households within an area derived by dividing the total population by the total dwelling stock within the area.	Grammatical correction.
AM89	300	Glossary	<ul style="list-style-type: none"> Remove definition of ‘Primary Shopping Area’ from the glossary as this term is not used in the Local Plan. Primary and <u>secondary Shopping Frontages</u> – Primary <u>shopping</u> frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and	Removal of unnecessary wording in response to the Inspector’s preliminary questions.

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			household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.	
AM90	304	Glossary	Town centre - Area defined on the local authority's proposal <u>policies</u> map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.	Factual correction the maps are called the Policies Maps.