

STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL

Report to Council Assembly

13th February 2018

TITLE:	Publication of Local Plan and adoption of Local Development Scheme
PORTFOLIO HOLDER:	Councillor Wain – Portfolio Holder for Planning, Development & Property
CONTACT OFFICER:	Pranali Parikh – Regeneration Manager
WARDS INVOLVED:	All areas outside of the Peak District National Park

Appendices Attached

Appendix 1 – Local Plan Submission Version
Appendix 2 – Local Development Scheme
Appendix 3 – Schedule of proposed changes to policies

1. **Reason for the Report:** To consider the publication of the Local Plan under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. To adopt the Local Development Scheme which formally establishes the timetable for the Local Plan and associated documents.
2. **Recommendations**
 - 2.1 That the Council agrees to adopt the Local Development Scheme.
 - 2.2 That Council consider the background evidence, Consultation Statements and subsequent analysis referred to in this report and associated documents.
 - 2.3 That the Council agrees to the proposals for the Leek Area in the Local Plan as set out in Appendix 1.
 - 2.4 That the Council agrees to the proposals for the Biddulph Area in the Local Plan as set out in Appendix 1.
 - 2.5 That the Council agrees to the proposals for the Cheadle Area in the Local Plan as set out in Appendix 1.

- 2.6 That the Council agrees to the proposals for the Rural Areas in the Local Plan as set out in Appendix 1.
- 2.7 That the Council agrees the remaining sections of the Local Plan as set out in Appendix 1.
- 2.8 That Councillors agree to delegate authority to the Executive Director (Place) to make non-material amendments to the Local Plan Submission Version (Appendix 1) document ahead of publication.
- 2.9 That, subject to any changes agreed by Council above, the Local Plan Submission Version be published for a minimum period of 6 weeks in order to invite representations on the soundness and legal compliance of the document prior to its submission.

3. Executive Summary

- 3.1 The adopted Core Strategy makes a commitment to undertake an early and comprehensive review of the plan for the period 2016 – 2031 to take account of longer term development requirements. It was decided that the review of should convert the existing Core Strategy into a single local plan combined with site allocations. This report sets out the Submission Version Local Plan for consideration. This stage is critical in the Local Plan process as the Council must now decide whether it believes the Local Plan to be “sound”.
- 3.2 To date, three public consultations have been undertaken alongside the gathering of extensive new evidence to inform the emerging Local Plan. At the last round of consultation on the Preferred Options Local Plan over 2600 responses were received from over 1000 individuals and organisations in addition to four petitions both for and against proposals.
- 3.3 This Submission Version Local Plan seeks to provide an overarching strategy for the development of the District up to the year 2031 which delivers the agreed housing and employment development requirements and wider objectives in a sustainable manner. However, it should be noted that the requirement for gypsies and travellers is not met through the allocation land. Nor does the plan meet the very top end of the objectively assessment need for housing falling 10 homes per year short. However, this can be justified under Paragraph 14 of the National Planning Policy Framework when the adverse impacts of meeting the full needs would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework or if specific policies in the Framework indicate that development should be restricted. The availability of suitable land in the District is severely constrained by factors including Green Belt and the Peak District National Park. The plan provides both strategic and more detailed development management polices and identifies specific sites and boundaries to help determine future planning applications.

- 3.4 The plan builds on the approach taken for the adopted Core Strategy with modifications to reflect new evidence, feedback and new Government policy and regulations. Key changes now proposed to be included in the Local Plan Submission Version include:
- Amendments to policies to reflect feedback, including from statutory bodies such as Historic England, that provide greater clarity, detail and support in helping the Council to meet the objectives of the Local Plan
 - Minor amendments to site boundaries at Land off Macclesfield Road, Leek (LE102), Stoney Lane, Endon, and Tunstall Road, Biddulph (BD117) and expected housing yields at site on the Mount, Leek (LE140, LE128), Land off Macclesfield Road, Leek (LE102), Stoney Lane, Endon, and Tunstall Road, Biddulph (BD117)
- 3.5 It is proposed the Submission Local Plan will be published for the statutory period of six week under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. During this period formal representations will be sought from the public and other stakeholders on whether they believe the plan to be complaint with the tests of soundness as set out in the National Planning Policy Framework or legal requirements.
- 3.6 Publication of the Local Plan and supporting documents including a Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment and Consultation Statement is proposed to take place on 27th February with a closing date for representation of 11th April. In line with the Local Development Scheme, the Council would then need to consider the representations received before deciding whether to submit the Local Plan and supporting documents to the Secretary of State in June 2018.
- 3.7 An updated Local Development Scheme (LDS) is recommended for adoption by the Council. The LDS sets out the programme of planning policy documents over the next three years. The key component of the LDS is the Local Plan timetable which accords with the timeframes previously agreed by the Council in 2017, namely publication in February 2018 and submission in June 2018. The LDS now also provides estimated timescales for the examination (September/October 2018) and adoption of the Local Plan (March/April 2019). However these estimated dates are dependent on the Planning Inspectorate's timetable and not within the Council's direct control. Details of related documents including proposed Supplementary Planning Documents are also included.

4. **How this report links to Corporate Priorities**

- 4.1 The Local Plan will have implications for all four aims of the 2017-2019 Corporate Plan, namely:
- Aim 1 -To help create a safer and healthier environment for our communities to live and work

Aim 2 - To meet our financial challenges and provide value for money

Aim 3- To help create a strong economy by supporting further regeneration of towns and villages

Aim 4 - To protect and improve the environment

5. Options and Analysis

- 5.1 **Option 1 (recommended) - agree to adopt the Local Development Scheme and to publish the Local Plan Submission Version as recommended in the report** – this will enable the Local Plan to be published in order to invite representations on the soundness of the plan before it can be submitted for examination in June in accordance with the timetable agreed by the Council. The Council will have an opportunity to consider any valid representations made during the publication period and consider whether any further significant changes are needed before the Local Plan is submitted. If further significant changes are considered necessary then a further round of consultation on those changes may be necessary before the Local Plan can be submitted which would extend the timetable.
- 5.2 **Option 2 (not recommended) - do not agree to adopt Local Development Scheme and Local Plan Submission Version** – the changes to the Local Plan are intended to make the plan sound for publication and subsequent submission for examination. If these are not made, or if alternative changes are made, there is a very significant risk that the Local Plan will not be found sound or that the Council may be advised by the Planning Inspectorate to reconsider the plan before any examination can take place or to withdraw the plan altogether. This would lead to a delay to the submission of the Local Plan until there has been further consideration to agree suitable changes. In the meantime the authority would continue to be vulnerable from speculative planning applications.
- 5.3 **Option 3 (not recommended) - make other changes to the Local Plan** – depending on the nature of those changes, this would carry a similar risk to option 2 in that they may make the Local Plan unsound or lead to a recommendation from the Inspector to withdraw the plan or suspend the examination.

6. Implications

6.1 Community Safety - (Crime and Disorder Act 1998)

None direct

6.2 Workforce

Highlighted in the report

6.3 Equality and Diversity/Equality Impact Assessment

This report has been prepared in accordance with the Council's Diversity and Equality Policies. An Equalities Impact Assessment of the Local Plan supports this report (see link at end of this report)

6.4 Financial Considerations

Highlighted in the report

6.5 Legal

In accordance with the Planning and Compulsory Purchase Act 2004 (as amended) (“the Act”), the Council has a statutory duty to prepare planning policies, which has been reinforced through the National Planning Policy Framework (NPPF) and the Localism Act 2011.

The Local Plan is a policy framework document as set out at Article 4 in the Constitution and is required by statute to be adopted by full Council.

Before the draft Local Plan can be considered for adoption, the process for preparing the Local Plan must be followed as is set out in the Act and the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”). S.19 of the Regulation state: “Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

In preparing the local plan, the local planning authority must take into account any representation made to them in response to the invitations above. In addition, the Council must comply with any commitments it has made in its adopted statement of community involvement.

The Council must also publicise its intended timetable for producing the Local Plan. This information is contained in the proposed Local Development Scheme which is subject to this report. The timetable should be published on the website, must be kept up to date and must have due regard to any guidance given by the Secretary of State.

6.6 Sustainability

A Sustainability Appraisal of the Local Plan and alternative options has been undertaken (see link at end of this report). Its findings have informed the recommendations made in this report.

6.7 Internal and External Consultation

The Local Plan has been subject to significant internal and external consultation in its preparation and, when published, will provide a further opportunity for comments to be made.

6.8 Risk Assessment

If the Council does not agree to the publication of the Submission Version Local Plan which is informed by evidence and relevant national policy and legislation, it will increase the risk that the Local Plan will be found “unsound” at Examination.

Without an up to date Local Plan in place, there is an increased risk of development coming forward which will have to be determined using the policies in the National Planning Policy Framework. This will significantly reduce the Council’s ability to resist development which is considered to be inappropriate. The Government has also introduced new powers for the Secretary of State to intervene when insufficient progress has been made on preparing Local Plans. These risks will be minimised, but not eliminated, if the Council resolves to support the option recommended in Section 5.

The Local Plan does not include sufficient land to meet the full objectively assessed need for housing or the identified need for gypsy and travellers accommodation. This carries a degree of risk as the plan does not fully demonstrate how this need will be met. The risk is in part mitigated through the criteria based policies in the plan which allow for future sites to be approved if they are suitable. These matters are also subject to discussions with neighbouring authorities under the Duty to Co-operate and officers will bring forward formal Statements of Common Ground covering strategic matters.

In addition, there is a risk that a revised version of the National Planning Policy Framework, which the Government is preparing,

may necessitate amendments to the Local Plan. The new NPPF may include a standard methodology for calculating housing requirements which has previously been the subject of national consultation. A full consultation draft of the NPPF is expected by Easter with the final version published in the Summer. Given the status of the draft proposals and the uncertainty regarding the final content, it is recommended that the Council proceed with the timetable as set out in the Local Development Scheme. However, the Council may be required to consider the implications of the new NPPF for the Local Plan at a later date. The Government expects that Local Plans that are submitted after the final NPPF is issued in the Summer to reflect the new standardised methodology. If the Council submits the plan on schedule, this is less likely to be an issue.

The Local Plan proposes an ambitious level of housing growth in order to support jobs growth. This increases the risk that the Council will not maintain its five year housing land supply in the future and the risk that it will fail the newly proposed Housing Delivery Test as set out by Government during the plan period. This risk will be mitigated by the Council taking a pro-active approach to supporting housing delivery. Linked to this is the relatively constrained level of development viability in the District. This will mean that the full level of affordable housing provision and other developer contributions may not always be achieved. The risk of this undermining development is mitigated by policy which allows the viability of development to be taken in to account at the planning application stage.

7. Background and Detail

The Core Strategy

- 7.1 The Staffordshire Moorlands Core Strategy was adopted in March 2014. The Core Strategy identified a housing requirement of 300 homes per year and an employment land requirement of at least 24ha over the period 2011 to 2026. The Core Strategy also established the appropriate distribution of development across the District with the emphasis being on development in the market towns of Leek, Biddulph and Cheadle with a more modest scale of development in the villages that lie within the Rural Area. However, the Planning Inspector who considered the Core Strategy determined that an early and comprehensive review of the Core Strategy for the period 2016 – 2031 would be required to take account of longer term development requirements. The review of the Core Strategy would also roll it forward into a single local plan combined with site allocations as recommended by the Planning Inspector who considered the Core Strategy. The publication of the Submission Version Local Plan is a key stage in this process.

The Local Plan

- 7.2 The Staffordshire Moorlands Local Plan will be a District wide development plan which replaces the Staffordshire Moorlands Core Strategy, Biddulph Area Action Plan (AAP) and previous 1998 Local Plan to provide a framework for delivering development for the period 2016 to 2031.
- 7.3 The Local Plan sets out the development strategy, strategic and development management policies and land designations for the District. It influences how and where the Staffordshire Moorlands will develop in the future. It sets out what the District Council would like to achieve in each of the main towns and the rural areas outside the Peak District National Park. The Local Plan also provides the framework for future detailed guidance to supplement the policies.
- 7.4 The Local Plan covers only that part of the District for which the Council has responsibility as a local planning authority. It therefore excludes the Peak District National Park which is covered by a separate policy framework prepared by the Peak District National Park Authority.
- 7.5 Having been subject to extensive consultation to date, the proposed publication of the Submission Version Local Plan is a critical stage in the preparation of the Local Plan as it must be deemed to be “sound” by the Council before it is submitted to the Secretary of State. In other words, the Council must be satisfied that the plan accords with the National Planning Policy Framework.
- 7.6 The Submission Version Local Plan builds on three previous public consultations regarding the Local Plan:
- **Site Options** consultation held between July and September 2015. Over 5500 responses were received regarding site and boundary options for housing, employment, mixed-use, open space, town centres, retail frontages, settlement boundaries and infill. Views were also sought on policy matters and potential changes to the Statement of Community Involvement (SCI). This built on earlier stakeholder engagement on allocations including a workshop with Parish Councils in 2014. An updated SCI was adopted by the Council on 13th April 2016.
 - **Preferred Options Sites and Boundaries** consultation held between April and June 2016. This led on from the 2015 Site Options consultation. Over 8600 responses were received regarding sites and boundaries. Analysis of the consultation responses informed the Preferred Options Local Plan that was agreed by the Council in July 2017.
 - **Preferred Options Local Plan** consultation held between July and September 2017 sought views on a complete Local Plan for the first time since the Core Strategy. Over 2600 responses were received from over 1000 individuals and organisations in addition to four petitions both for and against proposals.

7.7 The findings and implications of the Preferred Options Local Plan consultation are considered later in this report. A series of Consultation Statements also support this report which summarise feedback and issues arising from each of the consultations undertaken to date. These statements will be published alongside the Local Plan and are available to review online (see web link at the end of this report).

Policy context

7.8 The Submission Version Local Plan respond to national policy and legislation and evidence as highlighted in this section of the report. Paragraph 182 of the National Planning Policy Framework (NPPF) states that Local Planning Authorities are required to submit a Local Plan for examination that is considered to be “sound” – namely that it is:

- **“Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities which it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.”

7.9 In order for the Local Plan to be recommended for adoption by the Secretary of State, it must also be found to be legally compliant in terms of the relevant statutory requirements for undertaking a Local Plan. These include compliance with the Duty to Co-operate, the preparation and consideration of a Sustainability Appraisal of the plan, and compliance with consultation procedures as set out in the Council’s Statement of Community Involvement and regulations.

7.10 Paragraph 14 of the NPPF is a critical element of national planning policy both in relation to the preparation of Local Plans and in determining planning applications. As such, in order to pass the tests of soundness, it is essential that Local Planning Authorities to comply with its requirements. In relation to plan-making, the paragraph states that:

*“At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision taking.*

For plan-making this means that:

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted¹*

7.11 It is therefore clear that identified development needs for the District should normally be met. This issue was discussed in more detail in the report to Council Assembly on 8th March 2017 regarding the Local Plan development requirements for housing and employment. In terms of how this may be achieved, Paragraph 157 of the NPPF states that “...*Local Plans should:*

- *...indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map*
- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate*
- *identify areas where it may be necessary to limit freedom to change the use of buildings, and support such restrictions with a clear explanation*
- *identify land where development would be inappropriate, for instance because of its environmental or historic significance...*”

7.12 The NPPF specifies that the **Green Belt** is of great importance in order to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The NPPF is clear that “*once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan*” (Para. 83). However, the NPPF is equally clear that “*Local Plans should meet objectively assessed needs...unless specific policies...indicate development should be restricted*” (Paragraph 14).

7.13 With regards to **housing land**, Paragraph 47 of the NPPF requires local planning authorities “to identify a specific deliverable² sites sufficient to provide five years worth of housing against their housing requirements” with a buffer to provide choice and competition. In the medium to long term, the

¹ “For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.”

² “To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”

NPPF states that local planning authorities should “identify a supply of specific, developable³ sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”.

- 7.14 The NPPF allows for a windfall allowance to be included in the local planning authorities housing land supply calculations.
- 7.15 With regards to **employment land**, the NPPF requires local planning authorities to set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period (Paragraph 21). It goes on to state that when there is not a reasonable prospect of a site being used for employment, alternative uses should be considered (Paragraph 22).
- 7.16 In relation to **retail and town centres**, the NPPF places a strong emphasis on the need to support the vitality and viability of town centres. Paragraph 23 requires Local Plans to; define a network and hierarchy of centres, define the extent of town centres and related primary and secondary frontages. Primary frontages are defined as parts of a town centre with a high proportion of retail units. Secondary frontages include opportunities for a wider range of town centre uses such as restaurants and other businesses.
- 7.17 Paragraph 23 of the NPPF requires local planning authorities to undertake an assessment of the need for additional retail floorspace and for Local Plans to allocate land to accommodate identified needs.
- 7.18 Paragraph 73 of the NPPF requires that Local Plans provides sufficient land for **open space, sports and recreation** as identified by a needs assessment. Detailed policy for **traveller’s accommodation** is not set out in the NPPF. However, Paragraph 159 makes it clear that housing needs of different groups of the community should be assessed. The footnote 34 of the NPPF cross references to a separate Government policy statement, which determines how the needs for traveller sites should be assessed. Paragraph 9 of the Government’s planning policy for traveller sites states that local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- 7.19 Paragraph 162 of the NPPF set out policy in relation to **infrastructure provision**. It states that local planning authorities should assess the quality and capacity of infrastructure to meet forecast demands.
- 7.20 In preparing this Local Plan, consideration has also been given to other new or emerging policies and regulations, including; the Housing and Planning Act 2016, the Self-Build and Custom House Building Act 2015 and associated Regulations (2016), the Town and Country Planning (Brownfield Land

³ “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”

Register) Regulations 2017, Town and Country Planning (Permission in Principle) Order 2017, Neighbourhood Planning Act 2017 and the Housing White Paper published in February 2017. This was followed by the “Right Homes in the Right Places” consultation issued by Government in September 2017.

- 7.21 Key proposals included a new standardised methodology for calculating local housing needs, a requirement for Statements of Common Ground between authorities and organisations and the need to ensure that the full spectrum of housing needs are considered e.g. the needs of the elderly and affordable housing. The standardised methodology for identifying local housing needs was based on projected household growth and the ratio between average house prices and earnings. The suggested annual requirement for the District using this method would be 193 homes per years over a 10 year period. However, this approach does not take account of wider issues as currently considered such as economic growth. A new Housing Delivery Test is also proposed which would assess delivery against housing requirements with penalties for under provision. The outcome of this consultation is unknown. It is currently expected that the consultation will inform a new draft version of the NPPF that will itself be subject to consultation by Easter 2018. The formal introduction of the new NPPF which incorporates subsequent national policy changes is expected to follow in the Summer 2018.
- 7.22 Depending on the detail and the timing of their release, these changes may have implications for the Local Plan. On 30 January 2018, correspondence from the Government’s Chief Planning Officer sent to all local authorities confirmed the transitional arrangements for Local Plans being currently prepared in the context of evolving national policy. The implication is that the new standardised methodology for calculating local housing needs should only apply to plans which are submitted to the Secretary of State after the formal introduction of the revised NPPF in the “Summer”. Where the standard methodology is not applied after that date, local authorities will need to justify their approach. However, the Government consultation document proposed that where a plan is based on an assessment of local housing need which is in excess of the standard methodology, Planning Inspectors will be advised to work on the assumption that the approach is sound unless there are compelling reasons to indicate otherwise.
- 7.23 The Self-Build and Custom House Building Act 2015 and associated Regulations (2016) introduced a new requirement for 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 its planning and regeneration functions. The Regulations require that sufficient land is granted planning consent to meet the demand on the register within three years.
- 7.24 The Town and Country Planning (Brownfield Land Register) Regulations 2017 makes provisions for Councils to maintain a register of brownfield sites that are suitable for residential development irrespective of their planning status. The first register must be published by the end of 2017. Sites identified in

Local Plans may be included on the register alongside others that are currently considered suitable for development. Permission in Principle (PiP) may then be granted for some sites on the register. In December 2017, the Council published a Brownfield Register with 27 sites with an estimated capacity of 1166 homes. However, 18 of the sites already benefit from planning consent with the remainder consisting of proposed Local Plan sites or sites where permission has lapsed. No sites have been granted Permission in Principle at this stage. The Brownfield Register can be viewed on the Evidence Base web pages online via the link at the end of this report.

Evidence base

7.25 In addition to national policy, the Local Plan seeks to reflect the extensive evidence base which has been commissioned to ensure that the plan is robust. A list of key studies and headline findings is provided below. Full details of all studies can be viewed online via the web link at the end of this report:

- **Strategic Housing Market Assessment (SHMA) (2014) and Update (2017)** – the latest report identified an objectively assessed need for 235 to 330 homes per year to the year 2031. The bottom of the range (235) relates to the demographic needs. The top of the range (330) relates to the level of housing growth required to support the projected increase in jobs by addressing the projected decline in the working age population. A net annual need for affordable housing of 224 to 432 homes per year was also identified.
- **Employment Land Requirements Study (2014) and Update (2017)** – the 2017 identified an objectively assessed need employment land of 13 to 27ha up to the year 2031. The upper end of this range corresponds with the top of the assessed need for housing to provide a consistent approach. Development at the top of each range would support approximately 800 additional jobs in the District up to the year 2031.
- **Updated Gypsy, Traveller and Travelling Show Persons Accommodation Assessment (2015)** - identifies a requirement for 6x residential and zero transit pitches for the District over the period 2014 – 2019 (with an additional 2 residential pitches up to 2034)
- **Retail Study (2013) and Impact Study Threshold Review (2017)** – the 2013 Study identifies the need for a new foodstore in Biddulph. The Impact Study threshold Review re-confirms that the proposed threshold at which the Local Plan will seek applications to submit retail impact assessment for proposals outside of town centres is appropriate (200m²)
- **Green Belt Review (2015) and Updates (2016 and 2017)** – made multiple recommendations regarding the suitability of sites to be released from the Green Belt in exceptional circumstances. Please the study for site specific details.
- **Open Space Update Report , Open Space Standards Paper and Playing Pitch Assessment Report and Strategy (2017)** – reviewed current provision make recommendations the future. These include the provision of pitches and new play spaces

- **Landscape, Local Green Space and Heritage Impact Assessment (2016)** – assessed potential sites in term of the landscape and heritage impacts and made recommendations for mitigation. Potential new Local Green Space designations were also recommended following a review of Visual Open Space designations in the previous Local Plan
- **Draft Green Infrastructure Strategy (2017)** – identifies key corridors for Green Infrastructure that should be protected and enhanced including the Churnet Valley, Biddulph Valley Way and Cecily Brook
- **Ecological Study (2015) and update (2017)** – site assessment to identify specifics of ecological value and to make related recommendations for the site and mitigation where possible
- **Cheadle Town Centre Transport Study (2015) and Phase 2 Assessment (2017)** – identifies traffic constraints at peak periods and identifies a range of mitigations measures that could help to address the situation
- **Strategic Housing Land Availability Assessment (SHLAA) (2015)** – identifies a total potential supply of land for 14,029 homes. However, this does not apply policy constraints, including the Green Belt which is a significant factor in the District. An update to this assessment known as the Strategic Housing and Economic Land Availability Assessment (SHELAA) is under preparation. The assessment will also consider employment sites and will draw on the information that has informed the Submission Version Local Plan.
- **Development Capacity, Viability and Community Infrastructure Levy Study, including Infrastructure Delivery Plan (2016-2018)** – considers the viability of development in the district having regard to land value and development costs, including those which relate to the policy requirements of the Local Plan e.g. affordable housing contributions. Flexibility in the policies in terms of affordable housing and developer contributions is likely to be required to ensure that all sites can be delivered. The Infrastructure Delivery Plan feeds into the viability assessment and reviews current and future provision in relation to planned growth the Local Plan.

7.26 Full details of the evidence base are available on the Council's website. Where directly applicable to a site, a summary of relevant evidence is provided in the site pro formas which provided a summary of all consultation feedback evidence and conclusions drawn on a site by site basis . Proposed changes to policies in response to the evidence are identified within the proposed Submission Version Local Plan document (Appendix 1).

Sustainability Appraisal and Habitats Regulations Assessment

7.27 The Submission Version Local Plan is supported by a Sustainability Appraisal (see link at end of this report). The appraisal has helped to inform the content of the Local Plan. The Sustainability Appraisal itself will also proposed be published with the Local Plan. The appraisal considers options for development requirements, sites and policy proposals and meets the requirements of the European Directive on strategic environmental assessment.

7.28 A Habitats Regulations Assessment Report has also been prepared which considers which any impacts of the Local Plan against the conservation

objectives of sites of European importance for nature conservation in, and outside the plan area, to ascertain whether it would adversely affect the integrity of any sites concerned. These sites, often just referred to as European sites, include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). This report has also shaped the policies of the Local Plan. 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. Both the Sustainability Appraisal and Habitats Regulations Assessment can be viewed online via the web link at the end of this report.

Equalities Impact Assessment

- 7.29 An Equalities Impact Assessment has also been undertaken to consider how the Local Plan may impact upon different groups within the community. A summary of relevant findings are included in the site pro formas. Where the assessment has influenced policies, this is recorded in the proposed Submission Version Local Plan document (Appendix 1). They include additional references to the Green Infrastructure Strategy which may help in addressing health issues in the District by supporting active lifestyles. A copy of the assessment can be viewed online via the link at the end of this report.

Duty to Co-operate

- 7.30 In order to address strategic matters as required under the Duty to Co-operate as set out in section 110 of the Localism Act, the Council has worked with a number of relevant public bodies to identify and address such matters. This process will continue during the preparation and implementation of the Local Plan. To date, the following issues have been identified. A Duty to Co-operate Statement has been prepared to summarise the issues identified to date and progress made to address them. A copy of the statement is available to view online via the link at the end of this report. Key references include:

- The provision of suitable supporting infrastructure for planned growth, including transport, education, utilities, green infrastructure and health with Staffordshire County Council, Highways England, Clinical Commissioning Groups and other bodies. This work has fed into the Local Plan policies, sites and Infrastructure Delivery Plan and in principle support for future joint working to consider the implications of growth in the A50.
- The need to protect the setting of the Peak District National Park with adequate policies
- Meeting development requirements across the entire District, including the Peak District National Park and neighbouring areas with shared housing market and economic relationships. The Local Plan does not meet the top of the objectively assessed need for housing delivering 320 homes per year rather than the 330 identified in the SHMA Update. Officers have been working with relevant neighbouring authorities to address this issue and an agreement has been reached with the Peak District National Park Authority for the Local Plan to make an allowance of 100 homes to be completed within

the parts of the National Park that lie within the District.⁴ However, as there remains a deficit, discussions remain ongoing regarding the dwellings per year gap in provision with authorities with whom the District shares housing market relationships. This also applies to the unmet need for the provision of pitches for gypsies and travellers with no site taken forward in the District towards the requirements.

- Engaging in the emerging proposals for economic growth and investment through the Constellation Partnership which seeks to benefit from planned investment in HS2 at Crewe and beyond

7.31 The Council will continue to work with partners up to the submission of the Local Plan to address strategic matters. It is proposed that the Council seeks to negotiate “Statements of Common Ground” with relevant bodies to establish where co-operation is required and how this has been and will be undertaken. This would be in the spirit of the Government consultation from 2017 which sought views on the requirement for such agreements. Discussions have taken place to progress such agreements which will be considered by the Council at a later date,

Preferred Options Local Plan consultation feedback

7.32 The Preferred Options Local Plan consultation held between July and September 2017 sought views on a complete Local Plan for the first time since the Core Strategy. Over 2600 responses were received from over 1000 individuals and organisations in addition to four petitions both for and against proposals.

7.33 A Consultation Statement has been prepared which summarises and analyses all of the responses received and how the consultation was undertaken. This includes summaries and recommended responses to each individual consultation comment submitted and a breakdown of responses received to each aspect of the plan including policies and sites. A copy of the statement is available to view online via the link at the end of this report. Please note that due to the interactive nature of the consultation, comments for and against sites were registered to different aspects of the plan where the site in question was identified i.e. Policy H2 (Housing Allocations), a Strategic Development Site policy (where applicable) or the maps. Accordingly, summaries of comments the number of supports and objections are provided at each of these parts of the Local Plan.

7.34 A site-by-site summary of feedback regarding specific sites received in response to the consultation is also included in the site pro formas (link at end of this report). Feedback in relation to additional suggested sites submitted in response to the consultation has also been summarised with reasons why the sites are not recommended to be included in the Submission Version Local Plan (link at the end of this report).

⁴ This is based on past trends and does not relate to a development requirement for the Peak District National Park Authority.

7.35 An overview of the petitions received and some of the key issues raised during the consultation is given below:

- Concern regarding housing requirements which many residents consider to be too high whilst developers generally consider that the plan should provide more homes
- Feedback from statutory bodies and stakeholders regarding the wording of the various policies of the Local Plan with requests for further clarification and detail on matters such as heritage, sports and flood risk
- Comments both for and against proposed development sites with headlines including:
 - Land at the Mount, Leek – a significant response rate with the majority of comments objected to the site with concerns including landscape impact, loss of recreation asset to the town, traffic and infrastructure. Support was expressed by land owners including Staffordshire County Council
 - Wharf Road Strategic Development Area – significant response rate with a large number of comments received before for and against the site with a significant petition against (see table below). Concerns raised include loss of Green Belt, conflict with the Biddulph Valley Way, loss of wildlife and the availability of alternative sites. Comments in support favoured the site due to its proximity to the town centre and scope to re-balance the town
 - Yarn Mill and Minster Mill, Biddulph – significant response rate with the majority of comments support the site with reasons including the re-use of brownfield land, proximity to the bypass and the opportunity to tidy the site
 - Tunstall Road Strategic development Site, Biddulph – significant response rate with the majority in support of the development due to the location and accessibility of the site. Some concern was raised regarding the loss of Green Belt
 - Cheadle North Strategic development Area – low response rate with concerns including the lack of infrastructure and the inclusion of the school on the site due to access constraints. The site was supported by the developer who believe the site to be relatively free of constraints
 - Mobberley Farm Strategic Development Site – low response rate with mixed options. Concerns raised include mining legacy issues, distance from the town centre, traffic and the scale of development.
 - Cecilly Brook Strategic development Area – very low response rate with comments relating to the historic landscape
 - Blythe Vale, Blythe Bridge – low response rate with objections regarding infrastructure provision, loss of employment site and over-development of the village. Support for site was given on the basis of its location lack of need to release land from the Green Belt
 - Land at corner of Brookfield Avenue / Stoney Lane, Endon – objections relating to the loss of Visual Open Space, traffic/road safety, flooding, conflict with the school
 - Land off Ash Bank Road, Werrington – mixed response with concerns regarding access, loss of Green Belt and conflict with the adjoining

Young Offenders Institute. Support was conditional on the basis of good access and less disruption.

Petition	Number of signatures
Say NO to building on the GREEN BELT off Wharf Road, Biddulph, SOT, Staffs. ST8 6RU”	203 written signatures, 1257 online
The fight for our heritage WERRINGTON MEIGH ROAD ACTION GROUP ⁵	146 signatures
Petition in support of Staffordshire Moorland Local Plan for Werrington. 2017 With regard to the small pockets of open & visual land”	173 signatures
Objections to consultation Local Plan boundary changes at Bridge End, Leek; and to allocation LE102	Two submissions, with 25 and 11 signatures respectively

Proposed Submission Version Local Plan

7.36 As with the Preferred Options Local Plan, the proposed Submission Version uses the adopted Core Strategy as the basis for many of the proposed policies. The Submission Version Local Plan Local Plan (Appendix 1) comprises of the following main elements:

- A Portrait of Staffordshire Moorlands - a description of the District
- The Challenges - a summary of the key challenges facing the District
- The Vision – detailing what the Staffordshire Moorlands will be like in 2031
- Aims and Objectives – stating what the Local Plan is proposing to achieve
- A Spatial Strategy and Strategic Policies – setting out the over-arching strategy and policies for the District
- Development Management Policies – setting out specific measures to manage development
- Strategic Development Site Policies - specific policy to guide the development of strategic sites
- Implementation and Monitoring - a framework for how the plan will be implemented and monitored
- Maps - for Leek, Biddulph, Cheadle and the Rural Areas which identify proposed sites and boundaries. The maps will eventually form a separate “Policies Map” which will sit alongside the Local Plan from adoption.

⁵ Please note – this petition was against the “Fradley” site in Werrington which did not feature in the Preferred Options Local Plan.

- 7.37 The Local Plan carries forward the above details from the adopted Core Strategy with various exceptions where amendments to the Core Strategy are proposed. Amendments include re-worded policies, new policies and the provision of specific maps to illustrate proposed sites and boundaries in more detail. Where amendments to key elements of the Core Strategy are proposed, the Preferred Options Local Plan document identifies them (Appendix 1).
- 7.38 As in the Preferred Options Local Plan, the Submission Version includes an average annual housing requirement of 320 homes per annum and a gross employment land requirement of 27 Hectares. The distribution of housing is as follows. Leek 30%, Biddulph 20%, Cheadle 25% and Rural Areas 25%. The distribution of employment is as follows: Leek 30%, Biddulph 20%, Cheadle 20%, Rural Areas 30%. The residual housing requirement for the District of land is for 3859 new homes to be delivered between April 2017 and March 2031 (Policy SS4). This takes account of the housing backlog since 2012, housing completions between 2012 and 2017 and housing commitments (homes with planning consent) as of 31 March 2017. The housing trajectory identified in Appendix 7 of the Local Plan sets out the anticipated rate of development to 2031. This is expected to be below the average annual rate of 320 homes per year until 2020/2021. The average rate of development is then projected to be above 320 per year between 2022/2023 and 2028/2029 before falling again for the final two years of the plan. This is due to the expected lead in times and build out rates for the proposed site allocations.
- 7.39 It should be noted that the housing requirement of an annual average of 320 homes per year is 10 homes per year short of the top end of the range for the objectively assessment need for housing. However, this can be justified under Paragraph 14 of the National Planning Policy Framework when the adverse impacts of meeting the full needs would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework or if specific policies in the Framework indicate that development should be restricted. In March 2017, the Council agreed to the proposed housing requirement. The reasons were:
- It fully meets demographic housing needs and helps to address the affordable housing need. It also increases the scope to provide specialist housing such as Self-Build and Custom Build
 - Supports the provision of approximately 870 additional jobs up to the year 2031. This will help to set a positive economic strategy for the District in line with to Paragraph 21 of the NPPF
 - With a pro-active approach to delivery taken by the Council, is “aspirational, but realistic” when considered in the context of an historic average delivery rate of 178 homes per year
 - Is deliverable in terms of the supply of suitable housing land, the scope to release land from the Green Belt and infrastructure capacity
 - Is consistent with the requirement agreed by the Council in 2016. The majority of sites required for this level of development were not found to give rise to

significant landscape or heritage impacts, including on the setting of the Peak District National Park

- Provides a balanced range of social, economic and environmental effects as set out in the Sustainability Appraisal and is consistent with the four aims of the Corporate Plan when read as a whole

- 7.40 Similarly, the Local Plan Submission Version does not identify a site to accommodate the identified need for gypsies and travellers. Whilst a number of sites have been assessed during the preparation of the plan, none have found to be both suitable and available. As such, the requirement for such provision will need to be considered through the planning applications process applying the criteria set out in Policy H4. Development requirements relating to employment and retail are propped to be met in full in the Submission Version Local Plan through the identification of suitable land.
- 7.41 Again, as in the Preferred Options Local Plan, Green Belt release is proposed to support development in Biddulph (approx. 255 homes and 4.99ha employment land), Werrington (approx. 75 homes) and Cheadle (approx. 35 homes and highways infrastructure). Green Belt can only be released in exceptional circumstances. The Green Belt Review identified a number of sites that could be released from the Green Belt in exceptional circumstances. The Local Plan only proposes four locations where exceptional circumstances are considered to exist.
- 7.42 The Core Strategy acknowledged that some Green Belt release would be necessary to enable sufficient housing growth in Biddulph. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.
- 7.43 Housing in the Green Belt in the Rural Areas has also reduced significantly from 554 to 75 when compared with the 2016 consultation through adjustments to recommended sites and the Spatial Strategy. Green Belt release is proposed in Werrington given the residual housing requirement for the Rural Areas, the suitability and status of the proposed site as surplus public sector land and the lack of opportunities for growth within the village boundary of Werrington which is defined as a Larger Village. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.
- 7.44 Green Belt release in Cheadle is limited to the southern end of the Mobberley Farm Strategic Development Site. The land would support a new link road which would serve as access to the wider Mobberley Farm allocation which is of strategic importance to housing delivery in Cheadle. The link road may also form part of a solution to traffic constraints in Cheadle in the longer term. Give

the significance of this access and associated housing delivery, it is considered that there are exceptional circumstances to release the land from the Green Belt.

- 7.45 The following list provides an overview of key amendments to the Preferred Options Local Plan recommended by officers in light of; consultation feedback, new evidence, ongoing dialogue with statutory consultees and a review by officers including the Planning Applications team. The list is not exhaustive. A complete list of recommended policy changes is included in Appendix 3 to this report and in the Consultation Statement (see link at end of the report). Other minor changes to the supporting text to policies are also identified in Appendix 1 to the Consultation Statement. The proposed Submission Version Local Plan incorporates the recommended changes.

Summary of proposed changes to Spatial Strategy policies

- SS1 (Development Principles)
 - Amend text to include specific reference to the Peak District National Park in recognition of its significance for the District and reference to health
- SS3 (Future Provision and Distribution of Development)
 - Amend text to confirm that the development requirements are expressed as a minimum
- SS4 (Strategic Housing & Employment Land Supply)
 - Clarify that neighbourhood plan requirements do not necessarily require housing allocations
 - Clarify that Blythe Vale does not count towards employment land requirements
 - Update housing land supply figures for Leek, Biddulph and Rural Areas to reflect amended housing allocations (see H2 changes for details of sites)
 - Leek – extra 33 dwellings on allocations
 - Biddulph – extra 5 dwellings on allocation
 - Rural – extra 2 dwellings on allocations
- SS5 to SS11 (Leek, Biddulph, Cheadle, Rural and Churnet Valley Strategies)
 - Multiple amendments to add reference to the historic environment, active design and health with other minor amendments

Summary of proposed changes to Development Management policies

- SD1 (Sustainable Use of Resources)
 - Additional guidance to take account of soil quality and disturbance
- SD4 (Pollution and Water Quality)
 - Policy to include water quality with reference to River Basin Management Plans and Groundwater Source Protection Zones SD5 (Flood Risk)
 - Numerous amendments to provide further detail in light of feedback from the EA and SCC.
- SD5 (Flood Risk)

- Additional references to information required at the planning application stage and the approach to culverts and water run-off
- E1 (New Employment Development)
 - priority to commercial re-use of rural buildings over residential use, to be removed, to more closely align with NPPF; but retain support for commercial conversion
- E2 (Employment Allocations)
 - Add site EM2 (Leekbrook) and WA004 (Waterhouses) which were identified on the map and the figures but erroneously excluded from the list in the Preferred Options Local Plan
- E4 (Tourism and Cultural Development)
 - Remove requirement for applicants to demonstrate tourism need, or benefits to economy
 - Removal of limitation for new-build tourism to be conversions
- H1 (New Housing Development)
 - Remove requirement for housing to meet a genuine and proven need
 - Flexibility on space standards to allow for consideration of viability and design
 - Add in principle support for the sub-division of rural dwellings provided they are not isolated
 - Add support for redevelopment of brownfield sites in the open countryside provided they are not of high environmental
 - Amendment to flexible infill approach to;
 - Require development to be of an appropriate character for the village
 - Remove explicit requirement for development to be accessible to public transport, walking and cycling, infrastructure to be in place as these requirements are already reflected in other policies
- H2 (Housing Allocations)
 - Increase LE140 (Mount) by 15 dwellings as the land required for the school is less than previously thought
 - Increase LE128b (Mount) by 13 dwellings to apply a consistent density across LE128 a and b
 - Increase LE102 (Land of Macc. Road, Leek) by 5 dwellings due to a small extension of the site to reflect owner response
 - Increase BD117 (Land at Tunstall Road, Biddulph) by 5 dwellings to include small parcel of land to frontage of site to enable alternative access
 - Increase EN128 (Stoney Lane, Endon) by 2 dwellings to include small parcel of land to provide alternative access
- H4 (Gypsy and Traveller Sites and Sites for Travelling Showpeople)
 - Remove “in order to meet the identified needs of the District” because the policy would be used to assess applications irrespective of whether “need” has been identified
- DC2, DC3 and DC4 (Design, Historic Environment, Landscape and Settlement Setting)
 - Numerous amendments to provide greater detail in relation to supporting health and well-being, heritage and addressing flood risk

- New policy requirement for housing and commercial development be served by high speed broadband (>30mbps) unless it can be demonstrated that this would not be possible
- C1 (Creating Sustainable Communities)
 - Support added for development proposals which encourage electrical battery powered vehicles
- C2 (Sport, Recreation and Open Space)
 - Numerous updates to reflect new evidence - Open Space Study, Playing Pitch Strategy and Indoor Sports Facility Assessment
- NE1 (Biodiversity & Geological Resources)
 - Development seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development.
- NE2 (Trees, Woodlands & Hedgerows)
 - Replacement of 2:1 tree replacement concept with a more generalised “increase canopy cover” requirement
 - Consideration of off-site tree planting if on-site mitigation is not possible
- T1 and T2 (Development and Sustainable Transport and other Sustainable Transport Measures)
 - Updates to reflect feedback from Staffordshire County Council
- DSL1 (land at Horsecroft Farm)
 - Further details in relation to access and land for the school
- DSL2 (Land at the Mount)
 - Amendments to reflect smaller area needed for school and housing yields
- DSL4 (Cornhill East)
 - Amendment to require acceptable access arrangement to the site which must not be directly served off Sandon Street
- DSB1 (Wharf Road Strategic Development Area)
 - Added reference for development to ensure safety of users of the Biddulph Valley Way and guidance relating to heritage and biodiversity
- DSC3 (Mobberley Farm)
 - Remove requirement for developer contributions towards link road with policy for developers to construct the road to a suitable standard along the safeguarded route instead. Guidance relating to heritage and flood risk
- DSR1 (Blythe Vale)
 - Additional references for the need to liaise with Highways England, Network Rail and the Environment Agency
 - Add requirement for provision of suitable crossing facilities to enable access on foot and bicycle to the existing schools in Blythe Bridge
- Maps
 - Added Local Green Space boundaries at Westwood Recreation Ground, Leek and Braddocks Hay Recreation Ground, Biddulph which were omitted from the plans previously in error but were included in the schedule of Local Green Space as listed in Appendix 10 to the Local Plan.
 - Amendments to open space designation to reflect new evidence – this includes the removal of open space boundaries from school playing fields without public access

- 7.46 With these changes, it is considered that the Submission Version Local Plan provides a better framework of policies with which to manage development in the District. Whilst many of the proposed allocations received objections, having reviewed the nature of the comments and the available evidence, it is not recommended that further amendments are made to the site allocations. Nevertheless, it should be noted that in terms of housing provision, the Local Plan Submission Version is 35 dwellings below the housing requirement in Leek. However, the overall housing requirement for the District is met.

Conclusions

- 7.47 The Submission Version Local Plan is considered to be sound and legally compliant. It is therefore recommended that the Local Plan is published for representations. There are however risks to the plan which are considered in Section 6.8 to this report.
- 7.48 Nevertheless, it is essential that the Council seeks to adopt the Local Plan as soon as possible. By adopting the Local Plan, the Council will:
- Achieve a five year housing land supply
 - Have a greater ability to manage development in accordance with its own agreed policy framework and priorities
 - Provide local communities, landowners and developers with greater certainty over development opportunities which will help the District to attract the investment it needs to thrive
 - Reduce the risk of potential future sanctions by Government who are introducing new powers to intervene in areas without an up to date Local Plan

Local Development Scheme

- 7.49 Councils are required to prepare Local Development Schemes (LDS) to set out the timetable and programme for planning policy documents over a three year period. The Council last formally adopted an LDS in July 2012. As such, an updated LDS is recommended for adoption by the Council (Appendix 2).
- 7.50 The key component of the LDS is the Local Plan timetable which accords with the timeframes previously agreed by the Council in 2017, namely publication in February 2018 and submission in June 2018. The LDS now also provides estimated timescales for the examination (September/October 2018) and adoption of the Local Plan (March/April 2019). Details of related documents including proposed Supplementary Planning Documents are also included.

Next steps

- 7.51 The next stage of the Local Plan preparation process is publication and submission of the final document. Before a council submits a development plan document to the Secretary of State, it must publish and make available the documents it proposes to submit. The development plan document is published in order for representations (relating to issues of soundness) to be

made which must then be taken into account at the examination. Unlike previous consultation, this is a formal process which must follow the requirements set out in the Regulations and be for a minimum of 6 weeks.

7.52 The documents to be published and submitted comprise of:

- Local Plan (as proposed to be submitted) and accompanying Policies Maps
- Sustainability Appraisal report – an assessment of the sustainability of the Local Plan and reasonable alternative options
- Consultation Statement - a statement setting out: who was invited to be involved in the plan preparation, how they were invited to be involved in the plan preparation, a summary of the main issues raised and how they have been addressed
- Other supporting documents relevant to the preparation of the development plan document e.g. the evidence base studies

7.53 The statutory regulations and Statement of Community Involvement require that the authority makes copies of these documents available for inspection at Council offices and on the website and that it send a statement of the representations procedure and that the Local Plan is available for inspection to consultation bodies. Representations must be made within a 6 week period from the date these documents are made available.

7.54 After the 6 week period for making representations, the Council must consider the representations and consider whether to submit the Local Plan to the Secretary of State for examination. A summary of the main issues raised by the representations received will be produced which will go forward to be considered at the Examination. Further changes to the document are not encouraged at this stage since this should already have taken place during the plan preparation process. The underlying premise should be that the plan is considered sound by the Council at the time it is published.

7.55 Approval is also sought for the Executive Director (Place) to make non-material amendments to the Local Plan and supporting material in the run up to the publication date. This will include the correction of grammatical, typographical and formatting issues.

7.56 In line with the Local Development Scheme, the following dates are proposed. It should be noted that the dates for the examination and beyond are dependent on the Planning Inspectorate's timetable and not within the Council's direct control.:

- Publication of Local Plan – 27th February 2018
- Closing date for representations – 11th April 2018
- Council to consider submission of Local Plan – June 2018
- Submission of Local Plan – June 2018
- Examination – September/October 2018
- Adoption – March/April 2019

Dai Lerner
Executive Director - Place

	Location	Contact details
Web Links and Background Papers National Planning Policy Framework, National Policy for Travellers Sites and Planning Practice Guidance: http://planningguidance.communities.gov.uk/	Regeneration Services Moorlands House, Leek	<u>Mark James</u> Senior Regeneration Officer (Planning Policy) Tel: 01538 395400 ext. 3643
Local Plan evidence base: https://www.staffsmoorlands.gov.uk/article/1163/Evidence-base		
Consultation Statements, Sustainability Appraisal and Habitats Regulations Assessment, Equalities Impact Assessment, Duty to Co-operate Statement, Site pro formas, Additional site suggestions: https://www.staffsmoorlands.gov.uk/Publication_of_the_Local_Plan_and_adoption_of_the_Local_Development_Scheme		
Previous Local Plan consultations, http://staffsmoorlands-consult.objective.co.uk/portal/localplan/		