

Question 2 – Do you any comments regarding the proposed employment land requirement?

ID	Consultee Name	Company / Org	Agent Name	Agent Company / Org	Issue	Support / Object / General	Consultee Comments
PO9041	Gallagher Developments Ltd	Gallagher Developments Limited	Mark Rose	Define	Biddulph BD076 / BD076a	Object	My clients would object to a mixed use and employment allocation of 3.5ha in the northern part of Core Strategy Broad Area 4 (BD076 / BD076A). There has been a long standing allocation on that site, and they have marketed it for employment and commercial uses for over 10 years without success. Their firm view is that residential development is the only viable use on the site, and as such the entire site should be allocated for residential development in the Local Plan review. That course of action is explicitly supported by the NPPF which states (para. 22) that “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. ” Indeed, the Employment Land Requirements Study states (para. 8.4) that: “Whilst adopted and emerging Local Plan policies may seek to safeguard against the loss of employment land to other uses it is likely that, over the course of the plan period, some land will be lost to alternative use (for example where they are no longer suitable for employment use). In accordance with the Practice Guidance, market signals should be used by the LPAs as a guide to whether losses in certain areas will be appropriate or not.” It later (para 8.18) states: “any new provision should ensure that the layout, location and type of space is attractive to the market rather than purely focusing on the quantum of space delivered”. Furthermore, it is questioned whether the need actually exists for an employment allocation on this site in Biddulph. The consultation paper refers to an employment land requirement of 35ha in the District (para 3.16) which is in the middle of the range identified in the Employment Land Requirements Study (para 7.108: 25-45ha). However, the Study states: “it is recognised that the labour supply projections which link to the Objectively Assessed Housing Need are towards the lower end of this range. Whilst it has been acknowledged that there is not a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes”. Moreover, in relation to Biddulph specifically the consultation paper identifies a residual employment land requirement of only 1.95ha in Table 3.3, and a need for a 1000m2 discount foodstore in Table 3.4, but then proposes the allocation of a total of 10.24ha of employment land in and around the town. Consequently, in relation to Broad Area 4, given the clear lack of market interest in employment or commercial uses on the site, and the over riding need to increase the housing land supply in town as highlighted above, it is contended that these areas in the site should also be allocated for residential development in the Local Plan review as part of the wider site allocation.
PO362	Miss Jenna Woolliscroft				Biddulph	Object	Wildlife, beautiful scenery,
PO513	Mr Denver Johnson				Biddulph	Object	I've been a resident of Biddulph for forty one years and have seen many developments in the location over the years. Happily over that time the green spaces and views have survived relatively unchanged within that time, maintaining the spirit of a rural conurbation. The current threat to those very Green Belt spaces that set Biddulph apart as a little gem is untenable. It seems that crooked National government have connived with big developers (party sponsors) to twist arms up backs of Development Officers and override Councillors/Local Public Opinion to cherry pick development locations that they hope will bring in the most cash. Stupid insofar that any big development so close would bring down local property prices.
PO43	Mr P Rushton				Brown Edge	General comment	In the not too distant past Brown Edge had considerable employment sites occupied by a multiplicity of businesses. The SMDC Planning Authority have consistently allowed their replacement with houses, creating a situation which obliges residents to seek facilities and services in the adjacent City. Even before the proposed major housing development, Brown Edge is in dire danger of losing identity as a large Moorlands village and of becoming yet another urban housing area on the lines of neighbouring Norton but without the facilities and services. .

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PO388	Mrs Joanne Chadwick				Cheadle EM2	General comment	The employment land allocation for Cheadle is accessed by Draycott Cross road which is not suitable for heavy traffic and HGV's. It is steep, windey and narrow in places. Why has there not been further development in the north area where JCB have already erected 2 factories and improved the road to make access out of Cheadle More streamlined. This would seem to make more sense and have less impact on town traffic.
PO2735 PO2747 PO2743 PO2682 PO2677 PO3752 PO2656 PO2664 PO2723 PO2652 PO2696 PO2714 PO2615 PO2639 PO2604 PO2608	Mr R Snow Mrs V Weston Mr J Weston Mr A Hide Mrs D Hide Mrs J Richardson MR R OWEN-JONES Mr C Alcock Mr Albert Allen Mrs Lara Austin Mr Eric Cartlidge Mrs Karen Cartlidge Mr Alan Eaton Mrs Carole Edwards Mr Michael Feather Mrs Angela Feather				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.
PO2718 PO2739 PO2673 PO2643 PO2764 PO2894 PO2878 PO2855 PO2760 PO2975 PO2939 PO2934 PO2985 PO2970 PO2792 PO2814 PO2769 PO2777 PO2990 PO2838 PO2944 PO2648 PO2668 PO2660	Mr Andrew Gibson Mrs Karen Green Mr Gareth Owen-Jones Mr And Mrs T & J Prince Mrs J Weston Mr Alan Moss Mrs Margaret Moss mr michael tunnicliffe Mr Andrew Weston Mr Jason Baggley Mr Barry Fraser Mrs Catherine Fraser Mr Ronald Fryer M Glover Miss Angela Gregory Mrs Vera James Mrs H Keeling Mr Stefan Lilleker Mr I Menzies Lingard Mrs Christine Pickin D Pittman Mr & Mrs T & J Prince Miss Lynne Sanders Mr A Emery				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

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PO2631 PO2635 PO2727 PO2731 PO2686 PO2690 PO2625 PO2752 PO3014 PO3019 PO3034 PO3010 PO3049 PO3044 PO2949	Mrs Rosemarie Green Mr Clive Green Mr John Elks Mrs Mavis Elks Mr Philip Simcock Ms Marie Kennaway Mrs J Whitefield Mr D Weston Mrs J Foster Cllr Helen Lingard Mr & Mrs L & D Stevenson Mr Desmond Barnes Mrs Eva Moulton Mr K G Moulton D Pittman	Cheadle Town Council					
PO2773 PO3100 PO3024 PO2980 PO2801 PO2909 PO2964 PO3029 PO2995 PO3000 PO2954 PO2844 PO3039 PO3105 PO3054 PO3246 PO3137 PO3147 PO3236 PO3152 PO3095 PO3090 PO3132 PO3220 PO3241 PO3213 PO3085 PO3208 PO3203	Mrs K Rogers Mrs J Seddon Mr D Waring Mrs Susan Wiseman Mrs Florence Worsley Mr Raymond James Mr John Shipley Mrs Angela Jones Mr Michael Sposito Elvira Sposito Mr R Griffiths Mr H Simcock Mrs Susan Clare Mr D Gould Mr A Shenton Mr C Smith Mr N Watson Mrs J Davies Mrs M Snow Mrs J Titterton Mrs C Goodwin Mrs B Barks Mr A Ainsworth Mr D Ratcliffe Mr R Lees Mr R Ball Mr A Hewitt Mr J Hewitt Miss K Pickford-Avery				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

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PO3198 PO3193 PO3188 PO3080 PO3075 PO3070 PO3298 PO3303 PO3390 PO3544 PO3533 PO3583 PO3252 PO3607 PO3572 PO3427 PO3586	Mrs P Routledge Mrs A Rogers Miss S Ford Ms J Croft Mr W Wordsworth Mr J Lawler Mrs J Birks Mr M Birks Helen Abbey Mrs Michelle Plant Mr Lee Plant Ms Gina Boston K W Alcock Mrs Patricia Allum Mr Lee Austin Mr Craig Beardmore Mr Matthew Boston						
PO3456 PO3453 PO3366 PO3342 PO3374 PO3318 PO3411 PO3403 PO3339 PO3268 PO3262 PO3398 PO3406 PO3292 PO3183 PO3065 PO3177 PO3060 PO3230 PO3111 PO3116 PO3121 PO3225 PO3273 PO3279 PO3284 PO3289 PO3419 PO3666 PO3631 PO3626	Mrs Susan Brindley Mr Darryl Brindley Mr Tommy Frost Mr Colin Hayes Mrs F R Hayward Mrs Mary Jones Mrs Brenda Mills Mr David Tavernor Mr S Waring Mrs J.F. Eaton Mr A.R. Eaton Mr Saul Cutler Mrs Sara Tavernor Mr D Renshaw Mrs P Wordsworth Mr C Foster Mr P Hollywood Mrs A Hollywood Mr N Hewitt Mr I Millward Miss P Millward Mr B Clare Mr P Heath Mr and Mrs A Brown Mr S Hassell Mrs C Moseley Mrs B Heesman Mr A Massey K W Alcock Mr N Brooks Mrs P Brooks				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

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PO3461	Mr D Campbell						
PO3602	Mr K Davall						
PO3437	Mr G Davall						
PO3440	Mrs I Davall						
PO3506	Mr R Dennis						
PO3501	Mrs S Dennis						
PO3577	Mrs K Drummond						
PO3591	Mr A Drummond						
PO3523	Mr J Edwards						
PO3489	Mr M Elvidge						
PO3514	Mrs Anne Fox						
PO3634	Mrs Heather Frame						
PO3486	Mr Frank Harding						
PO3445	Mr Roger Johnson						
PO3477	Mr & Mrs D Keates				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.
PO3610	Mrs H Keeling						
PO3561	Mr K Mannion						
PO3618	Mr Darren Potts						
PO3674	Mrs G Potts						
PO3548	Mr & Mrs J & C Smith						
PO3615	Mr David Thomas						
PO3525	Maria Turley						
PO3569	Mrs Jennifer Vasselin						
PO3564	Miss Rachel Vasselin						
PO3594	Mr K Weston						
PO3652	Mr Kenneth Whitefield						
PO3497	Mrs Avril Woodward						
PO3494	Mr David Woodward						
PO3509	M Stevenson						
PO3347	Mr Christopher Jones						
PO3472	Mr D Hancock						
PO3469	Mrs J M Hancock						
PO3517	Master J Kennaway						
PO3358	Mr David Kennaway						
PO3371	Mrs M E Nicholls						
PO3334	Ms Allison Keates						
PO3332	Mr Alan Keates						
PO3522	Mr H J Gibson						
PO3553	Mr John W Bossons						
PO3556	Mrs R H Bossons						
PO3387	Mr A Gough						
PO3350	Mrs J Brown						
PO3639	Mr D Renshaw						
PO3854	Mr Philip Silk						
PO3661	Mr and Mrs V M Elks						
PO3677	Mr G Hodgkinson						
PO3682	Mrs K Smith						
PO3685	Mr I Crawford						

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PO3690 PO3698 PO3703 PO3706 PO3712 PO3714 PO3719 PO3724 PO3728 PO3733 PO3736 PO3741	Mrs J Crawford Mr JA Hayes Mr M Shirley Mr & Mrs M Nadova Mr P Cope Mrs J Cope Mr W Elks Mr D Richards Mr M Nad Ms T Janete Miss T Boulton Mrs J Sagers						
PO3744 PO3749 PO3757 PO3760 PO3765 PO3768 PO3776 PO3781 PO3784 PO3789 PO3792 PO3797 PO3800 PO3805 PO3809 PO3814 PO3817 PO3822 PO3825 PO3647 PO3830 PO3833 PO3838 PO3841 PO3846 PO3849 PO4792 PO4800 PO4815 PO4822 PO4780 PO4805 PO7468 PO7462 PO7456	Mr C Loving Mr T Loving Mrs C Hopkinson Mr and Mrs S Abbey Mrs P Richards Mr B Johnson Mrs J Richards Mr R Broad Miss E Clough Mr P Clough Mr G Barks Mr A Wilson Mr P Titterton Miss K Wilson Miss R Oulsnam Miss R Allen Miss J Seddon Mr A Fox Miss T Milward Mr K Pickin Mr A Millward Mr R Turley Mrs D Harrison Mr A Wright Mr D Tomkinson Mrs J Tomkinson Mr Richard Gallagher Jean Horsley Mrs Gillian Smith Ms Mary Walchester Mr & Mrs R & J Lovatt Mrs R Johnson Mr Jack Dempsey Ms Linda Powell Mr C Machin				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.

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PO3157 PO3172 PO3414 PO3323 PO3315	Mrs P Dunn Mr D Ratcliffe Mr Basil Brunt Mr Peter Brunt Mrs Hazel Brunt						
PO7075 PO7071	MRS PENNY PLANT Mr Alex Plant				Cheadle	Object	The housing allocation for Cheadle should be reduced to reflect the employment land allocation.
PO3379 PO3382 PO3326 PO3464 PO3395 PO3422 PO3363 PO3257 PO3355 PO3167 PO3127 PO3162	Mr Stanley Byatt Mrs Vera Byatt Mrs Jill Callear Mrs Joyce Campbell Miss L Chadwick Mrs Maureen Clewes Mr Harvey Cope Mr Roger Davis Mr David Fernihough Mr D Ainsworth Mr G Clewlow Mr D Dunn				Cheadle	Object	The employment land should be proportional to the housing allocation. In Leek and Biddulph this is the case, but for Cheadle and the Rural areas it is not. Cheadle is receiving a 2% higher housing allocation than employment land and visa versa for Rural Areas. I object to the housing allocation in Cheadle being higher than the amount of employment land available to support those houses. The housing allocation in Cheadle should therefore be reduced to 20%.
PO403	Mr David John Allen				General	Support	Generally support the allocation of employment sites. Would request that these are kept separate and not part of any mixed development.
PO1621	Mr John Steele				General	Object	Again the employment land requirement is based on an historical model which no longer holds true.
PO4393	Mr Andy Frost				General	Object	On behalf of our client, The Kemshead Family, we wish to make Representations in respect of a parcel of land at the Mount, Leek. The aim is to secure the allocation of the entire site within their ownership for residential development in the emerging Local Plan. 320 homes per year across District (2012-2031) remains inadequate because it fails to support potential employment growth. [Proposed District employment land requirement should be increased for the reasons set out in Supporting Statement attached to Question 1]. For the reasons given the Plan is therefore 'unsound' at present.

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PO9928	St Modwen Development Ltd	St Modwen Developments Limited	Ms Stacey Green	Barton Willmore	General	Object	<p>Email containing letter and Evidence Report submitted [both attached to PO9838]: the range of additional employment land proposed is 25-45 ha to support the identified 320 homes per annum. we consider that the overall employment land requirement should be balanced against any increase in housing requirement. We also note that the Council has chosen to support a mid point within the range, at 35ha. This does not point to a Local Plan that is seeking to be aspirational or responsive to growth opportunities. The residual requirement for new employment land, after completions and commitments, is only 19.4ha across the District. Just 6.37ha is identified as the residual requirement for the rural areas, which includes Blythe Bridge and Forsbrook. [Section 5 of attached Evidence Report seeks clarity on the calculation of the residual land requirement of 19.4ha and also explore the risks of the Rural Areas delivery of employment land, given that only one site (Cresswell) is allocated to meet this need for the entire District]. SMD/2014/0576 draft allocation at Cresswell: B1/B2/B8 uses, amounting to 33,480 sqm of employment floorspace. However, this site is not being marketed and it is not clear how deliverable it is. Question its suitability and marketability as access to the A50 is relatively constrained. [Committee report refers to 'enabling' housing development to cross subsidise employment development. Scheme attracted Policy objections because Cresswell not spatial strategy village. By direct comparison, Blythe Bridge and Forsbrook is a Larger Village, already acknowledged with a role within the distribution of the Local Plan Housing Requirement, and [with proposed] new sites.. for housing development. The St Modwen site already benefits from an allocation, an extant planning permission and the case that St Modwen make for a mixed use scheme, with cross funding and enabling development is entirely consistent with the principles that underlie the recently approved Cresswell proposals. the employment allocation at Blythe Bridge and Forsbrook appears to be made in respect of serving a Regional Need, as opposed to local needs. However our view that the St Modwen site is well placed to accommodate and attract local requirements as well as strategic requirements. Moreover, we see both local and regional markets as complementary, rather than being mutually exclusive. Council state RIS ' may have a role to play in supporting the Northern Gateway Regeneration Initiative. ' Both Stoke Staffs+ Cheshire Warrington LEPS see this Zone as a potential opportunity to establish high economic and housing growth predicated on HS2 investment in the area. Senior officers from the LEP and composite LPAs attended MIPIM in October 2015 to boost the awareness of the Initiative. The unknown timescales, uncertainty of the Phase 2 HS2 station at Crewe/Stoke on Trent, funding and potential for the site to have the necessary strong links with HS2, mean that there is a disconnect between the aims of St Modwen to deliver development within the next five years on this site, and the potential for it to tie into a Gateway Initiative that is still within its fledging stages. The Blythe Vale site represents a scheme that has been identified, allocated and consented over a period of almost 30 years, as a site offering strategic potential..The site is yet to come forward however there are initiatives within the local area (i.e. HS2, the growth ambitions of the LEP) that will assist over a period of time. In order to prime this delivery, St Modwen are proposing a more favourable mix of uses on the site, to include a broadening of the B Use Classes and residential development to assist with the viability and delivery of the site. Our position that part of the site, and the land south of the A50 can still offer employment opportunities, however, in order to facilitate development occurring on this site within the next five years, and with certainty within this Plan Period to 2031, a broader mix of uses is more appropriate. However, delivery of the site has also been obstructed by the infrastructure required to service Phase 1 and the reliance Phase 2 places on the successful development of Phase 1. Phase 2 forms the most obvious location for any large inward investor. However it is effectively landlocked as we understand no direct access from the A50 is likely to be permitted. As such, the Development Brief requires a crossing by bridge (or bridges) from Phase 1 in order to access the Phase 2. The technical solution to create a robust A521 access to Phase 1, which has detailed planning permission, is expensive. Delivering this access requires up-front investment and despite a significant improvement in market conditions, the funding of industrial and office development remains challenging. This is evidenced by the relatively few speculative developments undertaken within the wider region recently. Without external funding, the development of the first phase for just B class uses is unlikely to be viable. Instead, other more valuable uses, such as residential (including affordable housing), a local centre and leisure (e.g. a pub/restaurant), are required in order to enable the traditional employment elements (i.e. B class) of the scheme. These uses can all be delivered without altering Green Belt boundaries. The mix of uses needed to fund the infrastructure requirements of the overall development of the first phase is currently being reviewed. St Modwen are wholly supportive of the development of this site, but consider [refer to Evidence Base Report] that a more attractive opportunity, that will deliver benefits to the local community of Blythe Bridge and Forsbrook, would be for a mixed use development comprising housing, employment and ancillary</p>

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							development.
PO901	Dr Anthony Shallcross				Hollington	General comment	Hollington is a working village with jobs in agriculture, quarrying and increasingly recreation and tourism. The main problem is that young people who were born in the village cannot afford to buy properties in the village. An affordable housing development and/or a relaxation of planning restrictions on building on homesteads (see Housing) would make the village a more vibrant community with a lower age profile.

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PO3932	Mr Mike O Brien	WYG			Leek	Object	Refer to submitted Representations Report [attached to Question 1] which states: The Preferred Options document identifies a residual requirement for the delivery of up to 8.02ha of new employment land in Leek up until 2031. The proposed employment land allocations comprise 14.23ha, a significant surplus of 6.21ha over the residual requirement of 8.02ha. There is a clear and significant oversupply of employment land in Leek and therefore the loss of LE243 will have no detrimental impact on SMDC's employment strategy for Leek, particularly given the existing constraints; namely the residential location, access issues for HGV's and the proximity to playing fields and play area. The area strategy for Leek and subsequent allocations, as proposed within the Preferred Options Document, further support the lack of value of LE243 as an employment site. It is considered that [sites EM1 and EM2], as well as other in the south of the settlement as a whole offer much more appropriate opportunities for viable employment development in the future.
PO3922	Mr John Coxon	Emery Planning Partnership			Leekbrook	Object	Emery Planning is instructed by Wainhomes (North West) Limited to submit representations to the Preferred Option Site and Boundaries Consultation Booklet. The representations are made specifically with regard to our client 's site adjacent to Wardle Gardens, Leekbrook. [Refer to Report attached to Question 1 which also covers this question].
PO1278	Mr Yendole	Stafford Borough Council			Northern Gateway	Support	Stafford Borough Council has a border with Staffordshire Moorlands in the Cresswell and Blythe Bridge areas. A Regional Investment Site is proposed at Blythe Vale alongside the A50 to support the Northern Gateway regeneration initiative; Stafford Borough Council supports a focus on economic development in this locality through the Regional Investment Site, an employment allocation of 8.5 hectares proposed as an extension to Blythe Business Park at Cresswell as well as the Hadleigh Park Major Developed Site within Stafford Borough.