

STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL

Report to Council Assembly

13th June 2018

TITLE:	Submission of Local Plan to the Secretary of State
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

Please note: due to the size of files, other key supporting documents as listed at the end of this report can be accessed online via the web-links provided.

1. **Reason for the Report:** To consider the submission of the Local Plan to the Secretary of State under Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). A new Local Plan will shape and guide proposals for growth and investment in Staffordshire Moorlands up to 2031. It will provide greater certainty to all parties regarding the local development process and sets out proposed planning policies for the Staffordshire Moorlands District.
2. **Recommendations**
 - 2.1 That Council considers and approves the proposed submission version of the Local Plan as set out at Appendix 1 of this report for the purpose of submitting the same Plan, associated representations and evidence to the Secretary of State for examination under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
 - 2.2 That Council notes the schedule of late representations which have been considered and agrees to their inclusion in the version of the Local Plan which is submitted to the Secretary of State.

- 2.3 To agree that any minor corrections to the documents can be approved by the Cabinet Member for Planning, Development and Property so long as these do not substantially affect the substance of any policies or land allocations

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.
- 3.2 To date, three public consultations have been undertaken alongside the gathering of extensive new evidence to inform the emerging Local Plan. In addition, in February 2018 the Council published the Local Plan Submission Version for representations under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) for a period of six weeks closing on 11th April. The Council had agreed to publish the plan that it considered to be sound and legally compliant in February. During this period, formal representations were sought from the public and other stakeholders on whether they believe the plan to be compliant with the tests of soundness as set out in the National Planning Policy Framework or in line with legal requirements.
- 3.3 A total of 559 representations were received in response to the Submission Version Local Plan from 200 individuals or organisations. Of this 559, 8 were received after the deadline. A late document was also received in support of a representation that had been submitted before the deadline. It is recommended that the Council also accepts the late representations and submits them. Officers have reviewed the representations and have concluded that none necessitate further amendments to the Local Plan to make it sound or legally compliant. As such, it is recommended that the Council agrees to submit the Local Plan Submission Version to the Secretary of State for examination at the end of June. A schedule of minor modifications to the Local Plan have been identified by officers to address formatting or to provide additional clarity as to the intent of the proposed policies. It is recommended that this schedule is also submitted with the Local Plan, representations received in response to the Local Plan Submission Version, details of previous consultations and other supporting information as required by the Regulations.
- 3.4 The submission of the Local Plan in June would be a significant step towards the adoption of the Local Plan and would ensure that the timetable for submission as set out in the adopted Local Development Scheme is adhered to. Ultimately, by adopting the Local Plan, the Council will:
- Demonstrate 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 which is introducing new powers to intervene in areas without an up to date Local Plan

3.5 If the Council submits the Local Plan and supporting documents to the Secretary of State, a planning inspector will be appointed to undertake an examination of the Local Plan when parties that made representations to the Local Plan Submission Version have the opportunity to participate in the hearing sessions. The sessions normally commence at least 10 weeks after submission. The inspector will consider the outcome of the hearings and submitted representations and evidence before making recommendations regarding the plan. The adopted Local Development Scheme sets out the following timetable for the adoption of the Local Plan. Please note that after the submission of the Local Plan, the timescales are subject to change following input from the Planning Inspectorate:

- Council to consider submission of Local Plan – June 2018
- Submission of Local Plan – June 2018
- Examination – September/October 2018
- Adoption – March/April 2019

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 submit the Local Plan Submission Version to the Secretary of State**– this will enable the

Local Plan to be submitted in June 2018 in accordance with the timetable agreed by the Council in the Local Development Scheme. Officers have reviewed the representations submitted to the Local Plan Submission Version and concluded that none necessitate further modifications to the Local Plan that relate to soundness or legal compliance and therefore no further consultation is deemed necessary. If the Local Plan is submitted in June, it is anticipated that the hearing sessions for examination in public would commence in September 2018.

- 5.2 **Option 2 (not recommended) - do not agree to submit the Local Plan Submission Version** – this would lead to a delay to the submission of the Local Plan and would not comply with the Council’s agreed timetable for submission as set out in the Local Development Scheme. In the meantime the authority would continue to be vulnerable from speculative planning applications. If the delay would lead to the submission of the Local Plan being more than six months after the publication of the new National Planning Policy Framework (currently expected in July), this would mean that the Local Plan would need to follow new national policy as set out in the revised Framework. This in turn would lead to the need to update the evidence base in respect of key matters such as housing needs which in turn is likely to lead to further delay and the need for consultation.
- 5.3 **Option 3 (not recommended) – propose more significant modifications to the Local Plan** – new modifications that relate to the soundness of the Local Plan should not be submitted to the Secretary of State without further consultation. Officers have reviewed the representations and concluded that no such modifications are necessary. Extra consultation at this stage would also lead to delay and the same consequences as those outlined under Option 2.

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

6.4 Financial Considerations

The costs for the examination of the Local Plan will be met from the agreed budget.

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”) as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017. S.22 of the Regulations state that the following must be submitted to the Secretary of State; the sustainability appraisal report, a submission policies map if the adoption of the local plan would result in changes to the adopted policies map; a statement setting out who was invited to make representations under Regulation 18, how they were invited, main issues raised and how they were taken into account and how many representation were submitted under Regulation 20, the main issues raised, copies of the representations and supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.

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 Local Development Scheme.

The Local Plan must be subjected to Habitats Regulations Assessment (HRA), a parallel process which commences at an early stage in plan preparation.

This requirement is implemented in domestic English law through The Conservation of Habitats and Species Regulations 2010. The Local Plan is supported by an assessment as required as

considered in this report.

6.6 Sustainability

A Sustainability Appraisal of the Local Plan and alternative options has been undertaken. 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 in accordance with the Statement of Community Involvement.

6.8 Risk Assessment

If the Council does not agree to the submission of the Submission Version Local Plan it will delay the plan and conflict with the agreed timetable set out in the Local Development Scheme. 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 top of the range of the 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 have also been considered with neighbouring authorities under the Duty to Co-operate but the Council has been unable to secure agreement for any residual development requirements to be accommodated outside of the District.

A revised version of the National Planning Policy Framework (NPPF) was recently subject to consultation. The draft document included proposals of relevance to plan making including a new methodology for calculating local housing needs. However, the document went on to state that policies in the current NPPF will apply for the purpose of examining plans where those plans are submitted within six months of the publication of the new NPPF. "In these cases the examination will take no account of the new Framework". As highlighted in Section 5 of this report, if the

submission of the Local Plan is delayed, it will increase the risk that it must be examined under the new NPPF which in turn is likely to necessitate further evidence, consultation and more delay. New statistics and household projections are also expected to be released prior to the adoption of the Local Plan. The Council may need to consider the implications of such information when it arises.

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. Penalties for failing the test are likely to include the need to prepare an action plan to boost delivery, the application of a 20% buffer to the housing land supply requirement or relevant policies of the Local Plan being considered out of date depending on the extent to which the test is failed. 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 submission of the 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 in previous years (see Para. 7.6), the Council agreed to the publication of the Submission Version Local Plan in February 2018. At this point the Council determined that the Local Plan was “sound” and legally compliant and therefore that the document was ready for submission to the Secretary of State. However, under the terms of Regulation 19 and 20, a formal period of six weeks for representations regarding the soundness and legal compliance of the Local Plan ran from 27th February until 11th April.
- 7.6 The Local Plan Submission Version 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 representations received in response to the Local Plan Submission Version, Sustainability Appraisal and associated implications are considered later in 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 NPPF states that local planning authorities should “identify a supply of

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.”

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 Register) Regulations 2017, Town and Country Planning (Permission in

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.”

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 The report to Council Assembly on 13th February 2018 regarding the publication of the Local Plan also considered the potential national policy changes to be set out in a forthcoming consultation on revisions to the National Planning Policy Framework. The consultation was subsequently published by Government in March and ran until 10th May. 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. If the standard methodology as proposed by Government is included in the new NPPF, based on data currently available, the Local Housing Need figure in Staffordshire Moorlands (193 homes per year from 2016 to 2026) would be lower than the current Local Plan Submission Version requirement (320 homes per year to 2031) and full objectively assessed need for housing (330 homes per year to 2031). However, it is important to note that the current assessment of need which has informed the Local Plan to date includes an uplift to support economic growth and affordable housing provision which does not form part of the standard methodology. The new method also only determines the minimum number of homes to be provided. A new Housing Delivery Test is also proposed which would assess delivery against housing requirements with penalties for under provision. It is currently expected that the final new Framework will be published by Government in July 2018.
- 7.22 Critically, the consultation on the revised Framework also sets out the proposed transitional arrangements for implementing the new national policy. It stated that policies in the current Framework issued in 2012 which have formed the basis of the Local Plan Submission Version will apply for the purpose of examining plans where those plans are submitted within six months of the publication of the new Framework. In these cases the examination will take no account of the new Framework. If these transitional arrangements are implemented by Government and Council follows its agreed timetable for the Local Plan, the plan would therefore be examined under the current Framework. Nevertheless, that new Framework will be a material consideration for planning applications from the date that it is published.
- 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. The Local Plan Submission Version includes policies to support the delivery of such housing.

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. 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.

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. The 2017 Update was underpinned by the 2014-based household projections published by the Department of Communities and Local Government. An update to these projections – the 2016-based household projections are currently expected to be released later this year. The Council may need to consider the implications of the new projections for the Local Plan during the course of the examination.
- **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) and Review of Representations (2018)** – 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. A review of representations to the Local Plan Submission Version which questioned the findings of the study has also been undertaken to confirm if the original conclusions of the study remain robust. The review confirms that this is the case. Details of the consideration of the findings of the review are available in Appendix 1 to the Consultation Analysis Report of the Local Plan (available via the weblink at the end of this report).
- **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 n the District. An update to this assessment known as the Strategic Housing and Economic Land Availability Assessment (SHELAA) is proposed to be submitted with the Local Plan once finalised in June. The assessment also considers employment sites and draws on the information that has already informed the Submission Version Local Plan
- **Development Capacity, Viability and Community Infrastructure Levy Study, including Infrastructure Delivery Plan (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 Local Plan Submission Version document (Appendix 1).

Sustainability Appraisal and Habitats Regulations Assessment

- 7.27 The Local Plan Submission Version is supported by an updated Sustainability Appraisal (see link at end of this report). The appraisal has helped to inform the content of the Local Plan and considers options for development requirements, sites and policy proposals and meets the requirements of the European Directive on strategic environmental assessment. A Sustainability Appraisal was published with the Local Plan in February and subject to consultation. A Consultation Analysis report which sets out the feedback on the Sustainability Appraisal is provided via the weblink at the end of this report. The updated Sustainability Appraisal now also considers the additional (minor) modifications that are proposed to the Local Plan.
- 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 Local Plan Submission Version will not result in adverse effects on European sites, both alone and in combination with growth in neighbouring areas. Natural England has confirmed that they agree with this conclusion. The Habitats Regulations Assessment can be viewed online via the web link at the end of this report.
- 7.29 On 12 April 2018, the Court of Justice of the European Union (CJEU) issued a judgment which has implications for the preparation of Habitat Regulation Assessments. Officers have assessed the case and concluded that the Council's approach to the Habitat Regulations Assessment is in line with the judgement. Having reviewed, the implications of the judgement and guidance note issued by the Planning Inspectorate, it is the current view of officers that no further action is required as an Appropriate Assessment has been carried out.

Equalities Impact Assessment

- 7.30 An Equalities Impact Assessment has also been undertaken to consider how the Local Plan may impact upon different groups within the community. The assessment also confirms that the proposed modifications to the Local Plan do not have implications for equalities matters. Where the assessment has influenced policies, this is recorded in the Local Plan Submission Version document. 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

7.31 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. 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 District⁴. However, as there remains a deficit in housing supply of 10 homes per year on average when measured against the top of the range of the objective assessed need for housing. 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

7.32 Under the provisions of the forthcoming National Planning Policy Framework the Council has sought to negotiate “Statements of Common Ground” with relevant bodies. Such documents establish where co-operation is required and how this has been and will be undertaken. To date the following Statements of Common Ground have been prepared. Both documents have been approved by officers of the authorities involved. The statements have

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

been approved by the Portfolio Holder for Planning, Development & Property. Member approval has also been given by Newcastle-under-Lyme Borough Council for the statement that they are party to. Member approval from the other parties is currently being sought.

Statement of Common Ground with the Peak District National Park Authority

Strategic matter	Summary of Key Outcomes
<p>Working towards meeting development requirements</p> <ul style="list-style-type: none"> • Housing – the provision of housing across the two local planning authority areas 	<p>The Staffordshire Moorlands Local Plan makes an allowance for the completion of 100 dwellings within the District but inside the Peak District National Park up to the year 2031. This is based on past trends for development and reduces the need for housing allocations within the Local Plan.</p> <p>District Council housing officers will continue to reflect National Park purposes, policies and legal mechanisms when discharging their statutory housing functions in the National Park area</p> <p>Joint commitment to share monitoring data and work together on relevant evidence gathering</p>
<p>Working towards meeting development requirements</p> <ul style="list-style-type: none"> • Employment – the provision of employment across the two local planning authority areas 	<p>Acknowledgement that SMDC intends to fully meet the identified need for employment land and that the National Park's supply is limited by national policy constraints</p> <p>Joint commitment to share monitoring data and work together on relevant evidence gathering</p>
<p>Co-ordination of shared infrastructure</p> <ul style="list-style-type: none"> • Green Infrastructure 	<p>The authorities will co-ordinate green infrastructure strategies and any subsequent delivery plans to ensure a consistent and complementary approach.</p> <p>In the event that Staffordshire Moorlands District Council decides to implement a Community Infrastructure Levy, the scope to include Green Infrastructure shared with the National Park Authority on its Regulation 123. "Infrastructure List" would be considered and prioritised accordingly alongside other measures required to support growth</p>
<p>The need to recognise the statutory purposes of the Peak District National Park as well as the need to protect its setting.</p>	<p>Staffordshire Moorlands District Council recognises its duty to have regard to the purposes of the National Park as specified in the Environment Act 1995</p> <p>Agreement that the Local Plan supports the purposes of the National Park and provides</p>

	<p>protection to its setting</p> <p>Commitment for consultation and engagement on planning applications which may have implications for the National Park</p>
Support for neighbourhood plans which span the boundary of the two authorities	<p>Agreement on the provision of shared support for neighbourhood plans that span the National Park boundary.</p> <p>Agreement in relation to funding and grant support for neighbourhood planning based on the distribution of population across the Peak District National Park and Staffordshire Moorlands Local Plan areas within the neighbourhood area in question</p>

Statement of Common Ground with Stoke-on-Trent City Council, Newcastle-under-Lyme Borough Council and Stafford Borough Council.

Strategic matter	Summary of Key Outcomes
<p>Working towards meeting development requirements</p> <p>Housing – the provision of housing across the four local planning authority areas</p> <p>Gypsies, Travellers and Travelling Showpeople – provision for accommodation</p>	<p>Acknowledgement that no authority is currently able to assist in addressing any unmet housing or travellers needs from neighbouring authorities</p>
<p>Employment – the provision of employment across the four local planning authority areas</p>	<p>Acknowledgement that no authority is currently able to assist in addressing any unmet employment needs from neighbouring authorities</p>
<p>Co-ordination of shared infrastructure</p> <ul style="list-style-type: none"> • Green Infrastructure 	<p>Authorities co-ordinate green infrastructure strategies and any subsequent delivery plans to ensure a consistent and complementary approach</p>
<p>Traffic growth on A50</p>	<p>A commitment from partners to work together to work together with Highways England and Staffordshire County Council to address traffic impacts on the A50</p>
<p>Education</p>	<p>A commitment to liaise with one another and Staffordshire County Council to address matters that may arise in terms of accommodating growth and the subsequent demand for school places.</p>
<p>Green Belt –co-operation on the approach to Green Belt</p>	<p>The authorities all include areas of the North Staffordshire Green Belt.</p> <p>Green Belt release is proposed to support development in Staffordshire Moorlands</p>

	The authorities will liaise on any future Green Belt reviews that would affect shared the Green Belt boundaries in order to consider the merits of a consistent approach
Constellation Partnership – co-operation on any future joint strategy in support of the potential HS2 hub at Crewe	Emerging or future Local Plans will have regards to the Constellation Partnership's Growth Strategy
Blythe Vale Strategic Allocation – consideration of the cross boundary implications of the allocation as identified in the proposed Staffordshire Moorlands Local Plan	<p>Support for the allocation in the Local Plan</p> <p>Commitment from partners to liaise on the implementation of the policy for the site in the Local Plan</p> <p>Masterplan to be prepared which will include delivery of employment land to the south of the A50.</p>

Representations to Local Plan Submission Version

- 7.33 The Local Plan Submission Version was published for representations relating to soundness and legal compliance on 27th February for a period of six weeks. In line with the adopted Statement of Community Involvement, the Council invited all contacts on the consultation database to submit representations by post and email with representations invited back by post, email or online.
- 7.34 559 representations regarding the Local Plan Submission Version were received. Of this number, 8 representations were submitted after the deadline along with a document in support of a representation submitted prior to the deadline. It is recommended that these late representations and details are included in the submission to the Secretary of State to allow full consideration of all feedback regarding the Local Plan Submission Version. A total of 70 representations were received regarding the Sustainability Appraisal of the Local Plan.
- 7.35 Two Consultation Analysis Reports have been prepared which summarise and analyse all of the representations received and how the consultation was undertaken for the Local Plan Submission Version and Sustainability Appraisal respectively (both available via the weblink at the end of this report). This includes summaries and recommended responses to each individual representation submitted and a breakdown of responses received to each aspect of the plan including policies and sites. 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. No petitions were received in response to the Local Plan

Submission Version. However, as reported to Council Assembly in February 2018, the Council is in receipt of petitions in response to previous rounds of consultation that relate to aspects of the Local Plan that remain within the document.

- 7.36 Many of the policies in the Local Plan Submission Version received little response. However, policies that relate to the amount of housing, the distribution of development across the District and the allocation of sites received a higher level of response. The most contentious issues raised include:
- The housing requirement is either too low or too high.
 - The Local Plan does not provide enough flexibility to support housing growth
 - The approach to infill and development around the Larger and Smaller Villages, particularly the proposal not to include boundaries for the Smaller Villages
 - Amendments sought to the distribution of housing development across the District. The Local Plan Submission Version seeks to reduce the percentage of housing in the Rural Areas to minimise Green belt release with a corresponding increase in Cheadle. Representations have called for different levels of housing growth from that proposed in different areas of the District, including the Rural Areas and Cheadle
 - The selection of proposed sites, including those with Green Belt release, with some residents objecting to sites due to concerns about their impact and landowners / developers objecting to sites whilst promoting alternative allocations (referred to as omission sites). A schedule of 41 “omission sites” and a summary of the reasoning why they are not included in the Local Plan is available to view via the weblink at the end of this report. The omission sites are distributed across the District as follows; Leek - 3, Biddulph - 8, Cheadle - 6, Rural – 24.
- 7.37 Appendix 1 of the Consultation Analysis Reports for the Local Plan and Sustainability Appraisal provides a summary of each individual representation and an officer response. Having reviewed all of the representations, including those relating to the above concerns, officers do not consider that any necessitate any further modifications to the Local Plan in relation to soundness or legal compliance. In publishing the Local Plan Submission Version in February 2018, the underlying premise was that the Council has considered it to be a sound document. Further significant changes to the document are therefore strongly discouraged at this stage since this should already have taken place during the plan preparation process. Accordingly, the recommendation that the Local Plan Submission Version as agreed for publication by the Council in February 2018 should be considered both sound and legally compliant remains.
- 7.38 Nevertheless, a number of minor “additional” modifications to the Local Plan have been identified by officers to address formatting errors or to provide further clarity regarding the intent of policy. Such modifications are not

necessary to make the Local Plan sound or legally compliant. A schedule of proposed additional modifications is available via the weblink at the end of this report. It is recommended that this list of additional modifications is included in the submission to the Secretary of State for consideration.

Proposed Submission Version Local Plan

7.39 Given the above, it is recommended that the Council submits the Local Plan that was agreed for publication in February alongside the schedule of additional modifications to the Secretary of State for examination. A copy of the Local Plan Submission Version is provided at Appendix 1 to this report. To recap, the Local Plan Submission Version 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.

7.40 Key proposals in terms of the level and distribution of housing and employment development in the Local Plan Submission Version include:

- An average annual housing requirement of 320 homes per annum
- 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)⁵. 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

⁵ As of 31 March 2017. The position as of 31 March 2018 is currently being determined to take account of completions, new and lapsed permissions.

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. 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.

7.41 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

7.42 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 for allocation purposes. 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. Following a planning approval granted in February 2018, the residual requirement is for three pitches for the period 2014 to 2019 (with an additional 2 residential pitches up to 2034).

- 7.43 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.
- 7.44 The Core Strategy acknowledged that some Green Belt release would be necessary to enable sufficient housing growth in Biddulph. The Local Plan Submission Version 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.
- 7.45 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.
- 7.46 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. Given 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.

Conclusions

- 7.47 The Local Plan Submission Version is considered to be sound and legally compliant. It is therefore recommended that the Local Plan is submitted to the Secretary of State for examination. 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. The submission of the Local Plan in June would help the Council to achieve this aim and would ensure that the timetable for submission as set out in the adopted Local Development Scheme is adhered to. Ultimately, by adopting the Local Plan, the Council will:

- Demonstrate 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 which is introducing new powers to intervene in areas without an up to date Local Plan

Next steps

- 7.49 Subject to there being no significant changes made to the Local Plan, the next stage will be to submit the document with all of its supporting documentation and information to the Secretary of State together with the representations that have been received. At this point the Planning Inspectorate will appoint an Inspector and undertake the examination, with an examination hearings taking place normally at least 10 weeks after submission.
- 7.50 As soon as practicable after submission, the Council must also make copies of all of documentation available in accordance with the regulations, notify various consultation bodies and those who made representations and requested to be notified of the submission of the documents.
- 7.51 A Programme Officer has been identified whose task will be to organise and administer the examination under the direction and guidance of the Inspector. This person acts independently of the Council and reports only to the Inspector. The Programme Officer will liaise with those making representations to ensure that they are kept fully engaged in the examination process.
- 7.52 The Inspector will make an initial assessment of the Local Plan once it has been submitted for examination. Where any major concerns are identified, in relation to the duty to cooperate, other procedural requirements or the soundness of the plan, the Inspector will write to the local planning authority setting these out. Where the issues cannot be addressed through correspondence the Inspector may arrange for an exploratory meeting to take place.
- 7.53 If the Inspector considers that the local planning authority has not met the duty to cooperate or other procedural requirements then the Inspector may suggest that the plan is withdrawn to allow these issues to be rectified. Where the Inspector has significant concerns about the soundness of a submitted plan, they may also suggest that the plan is withdrawn, but exceptionally may also suspend the examination process to give the local planning authority time to undertake further

work to address the issues raised.

7.54 Following the examination the Inspector will issue a report. If asked to do so by the local planning authority the Inspector can recommend 'main modifications' (changes that materially affect the policies) to make a submitted Local Plan sound and legally compliant.

7.55 The following dates are set out in the adopted Local Development Scheme for the next stages in the process. 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:

- 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

Web Links and Background Papers	Location	Contact details
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 Analysis Report for Local Plan Submission Version, Consultation Analysis Report for Sustainability Appraisal, Schedule of Proposed Additional Modifications to the Local Plan, Schedule of Omission Sites, Schedule of Late Representations, Sustainability Appraisal (June 2018), Equalities Impact Assessment (June 2018), Habitat Regulations Assessment Addendum: https://www.staffsmoorlands.gov.uk/article/3727/Submission-of-Local-		

[Plan-to-Secretary-of-State-Report--
-Supporting-Documents](#)

Local Development Scheme:
[https://www.staffsmoorlands.gov.uk
/article/3488/Local-Development-
Scheme](https://www.staffsmoorlands.gov.uk/article/3488/Local-Development-Scheme)

Statement of Community
Involvement:
[https://www.staffsmoorlands.gov.uk
/article/1165/Statement-of-
Community-Involvement-SCI](https://www.staffsmoorlands.gov.uk/article/1165/Statement-of-Community-Involvement-SCI)

Previous Local Plan consultations
and supporting evidence,
[http://staffsmoorlands-
consult.objective.co.uk/portal/local
plan/](http://staffsmoorlands-consult.objective.co.uk/portal/local-plan/)