



Newcastle-Under-Lyme Local Plan 2020-2040



Final Draft Local Plan Regulation 22
Statement of Consultation Part 1
Regulation 18 Summary

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1. Introduction

- 1.1. This document is a consultation statement required under Regulation 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It accompanies the submission of the Newcastle-under-Lyme Borough Local Plan 2020 – 2040 for examination. This statement sets out how the Council has engaged with stakeholders in the preparation of the Local Plan 2020 – 2040. It details the bodies and persons invited to make representations; how those bodies and persons were invited to make representations; a summary of the main issues raised by representations; and how representations have been considered in the preparation of the Plan.
- 1.2. Between 2013 and 2020, the Borough Council worked with Stoke-on-Trent City Council to produce a joint Local Plan. A decision was taken by the Borough Council in January 2021 to withdraw from this arrangement and produce a single Local Plan for Newcastle-under-Lyme. Following this decision, a letter was sent, in February 2021, to consultees on the Council's Local Plan consultation database to enquire about whether that stakeholder wished to remain on the Borough Council's database. In June 2021, the Council wrote to landowners on the Council's Strategic Housing Land Availability Assessment to confirm whether landowners still wanted to include their land for consideration through the Local Plan.
- 1.3. For the avoidance of doubt, this report documents consultation activities since the decision to withdraw from joint arrangements with Stoke-on-Trent City Council. This report considers the stages leading up to the consultation on the Regulation 19 (Final Draft Local Plan 2020 – 2040) and includes the main stages of consultation on the Issues and Strategic Options and First Draft Local Plan consultations. A separate part 2 report has been prepared for the consultation on the Final Draft Local Plan.
- 1.4. Newcastle-under-Lyme Borough Council consulted on the First Draft Local Plan 2020 - 2040 from 19 June through to 14 August 2023. This followed consultation on an Issues and Strategic Options document which took place from the 01 November 2021 to 24 January 2022.
- 1.5. The Council is required to consult with stakeholders at different stages of developing a Local Plan; the first of which is under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 (preparation of a local plan) requires the Council to notify stakeholders that it is preparing a plan and to invite them to make comments with their views on what the plan should contain. There is flexibility in how the initial stages of consultation and plan preparation can take place.
- 1.6. The Council's Statement of Community Involvement (SCI) sets out how the Council will involve sectors of the community in the planning process. The SCI has been followed, as appropriate, in undertaking the consultation on the Issues and Strategic Options and First Draft Local Plan.
- 1.7. The Council has actively engaged with the Borough's key stakeholders and local communities in the following consultation stages: -

Table 1: Stages of Local Plan Consultation

Consultation	Scope	Dates
Issues and Strategic Options Consultation	The Issues and Strategic Options document identified key planning issues facing the borough over the next Local Plan period (to at least 2040), potential options to address them and suggested policy options.	01 st November 2021 – 24 January 2022
Draft Sustainability Appraisal Scoping Report	The Sustainability Appraisal Scoping report identified the scope and level of detail of information to be included in the Sustainability Report in line with relevant regulatory requirements.	
Call for Sites, including Brownfield Call for Sites	The call for sites invited local residents, landowners, developers and other parties to put forward sites for consideration through the Local Plan process for housing, employment, or other development (including Gypsy and Traveller sites).	01 st November 2021 – May 2024. This call for sites period involved a dedicated brownfield call for sites from the 8 November 2022.
First Draft Local Plan Consultation	The First Draft Local Plan set out a suite of draft policies and allocations. It included a number of options at a draft stage in respect of the Local Plan, including the selection of strategic sites.	19 June 2023 - Monday 14 th August 2023

2. Issues and Options Consultation

1.8. The Council consulted on the following documents: -

- Issues and Strategic Options Consultation
- Sustainability Appraisal Scoping Report
- Equalities Impact Assessment

1.9. Evidence base documents associated with the Issues and Strategic Options document were also published on the Council's website.

Consultation Process

1.10. Consultation on the Strategic Issues and Options document started on the 01 November 2021. Comments were invited on the Strategic Issues and Options Document until the 13 December

2021 originally, but the consultation period was extended until the 24 January 2022. This was due, in part, to an administrative error that was identified in relation to the hierarchy of centres on page 31 of the consultation document.

- 1.11. Consultation comments could be made using a dedicated online consultation portal (Keystone Objective) or in writing by post to the Council Offices at Castle House, Barracks Road, Newcastle. Alongside the Issues and Strategic Options document, the Sustainability Appraisal Scoping Report and Equality Impact Assessment were also made available. The evidence base for the local plan was furthermore published on the Council's evidence base page.
- 1.12. Copies of the consultation documents alongside information about how to submit comments were published on the Council's website. Hard copies of the Issues and Strategic Options document were made available, along with information posters, at all libraries across the borough. These were: -
 - Newcastle Library, Castle House, ST5 1BL
 - Clayton Library, ST5 3HW
 - Silverdale Library, ST5 6LY
 - Talke Library, ST7 1RA
 - Kidsgrove Library, ST7 1BS
 - Knutton Library, ST5 6EB
 - Audley Library, ST7 8DB
 - Loggerheads Library, TF9 4NX
- 1.13. Notifications were sent to named individuals and organisations on the Council's Local Plan consultation database. The Council also notified those specific and general consultees and stakeholders set out in Appendix 1 of the Statement of Community Involvement.
- 1.14. The consultation was promoted through a variety of other means. These included:
 - Via social media: - posts were made on Facebook and Twitter (now X)
 - Updates on the Council website's latest news webpages
 - Press release published on the 26 October 2021 in the local paper, the Stoke Sentinel

Consultation Events

- 1.15. The Council held a number of drop-in sessions and appointments, where local residents could find out about the Issues and Strategic Options document and the manner in which representations could be made. Table 1 outlines the 13 events (10 in person and 3 virtual) held across the Borough.

Table 2: List of consultation 'drop in' events Issues and Options

Event	Date
Newcastle Town Centre Guildhall	Tuesday 02 November 2021
Kidsgrove Town Hall	Wednesday 03 November 2021
Silverdale Library	Thursday 04 November 2021
Chesterton Holy Trinity Church Hall	Tuesday 09 November 2021

Loggerheads Oddfellow's Hall	Wednesday 10 November 2021
The Madeley Centre	Monday 15 November 2021
Audley Methodist Church	Wednesday 24 November 2021
Virtual Consultation (Zoom or telephone)	Wednesday 17 November 2021
Virtual Consultation (Zoom or telephone)	Tuesday 30 November 2021
Newcastle-under-Lyme Borough Council Offices	Thursday 02 December 2021
Audley Methodist Church	Tuesday 11 January 2022
Virtual Consultation (Zoom or telephone)	Wednesday 12 January 2022
Keele Village Hall	Thursday 13 January 2022

- 1.16. Officers from the Council's Planning Policy team were available at the in-person locations between 15:00 hours and 19:00 hours (11:00 hours – 13:00 hours for the first event) to assist members of the public to find out more about the Issues and Strategic Options document. This included being available to answer questions and to provide advice on how to use the consultation portal. In addition, presentations (via Zoom) were provided to two Parish Councils following direct requests. These separate Parish Council events took place on 11 November 2021 for Audley Parish Council and 1 December 2021 for Madeley Parish Council respectively.

Responses to the Consultation

- 1.17. A total of 289 people made comments on the Issues and Strategic Options document. Their comments equated to 3,646 individual representations. These representations were provided with individual responses by Planning Policy Officers for the consultees to read. All comments which were sent to the Borough Council by post, which did not form part of the below petitions, were scanned and uploaded to the consultation portal and are included in the above figures.
- 1.18. Two petitions were submitted to the Borough Council: one containing 294 signatures, with the other containing 1376 signatures. Both of these petitions were in response to Question 18 of the Issues and Options document; should site AB2 – Land southeast of Junction 16 be considered for Green Belt release? These petitions were scanned and uploaded to the consultation portal. A further 757 residents submitted an identical letter to the Borough Council in response to the consultation. This has also been treated as a petition and all details of the consultees who submitted this letter have been collated into a spreadsheet and uploaded to the consultation portal.
- 1.19. Therefore, it can be concluded that 2716 people interacted with the consultation, either via the consultation portal, signing a petition or submitting the identical written letter. These consultees were added to the consultation database and received updates on the next stage of the plan making process. The petitions combined with the representations made via the consultation portal provided for 6,073 representations made on the Newcastle-under-Lyme Local Plan Issues and Strategic Options Consultation.

3. Call for sites

Consultation Process

1.20. The Council has engaged with a call for sites process from the 01 November 2021 until early 2024. Alongside this, in November 2022, the Council engaged with a dedicated brownfield call for sites. A poster was created for the brownfield call for sites, which was posted to the planning policy latest news section on the 8 November 2022. On the same day, subscribers to the local plan consultation database received copies of the poster along with guidance and the opportunity for posters to be printed for them. On the 9 November 2022, the Stoke Sentinel newspaper published an advert with the Call for Sites Information. Additionally, on the week commencing the 14 November 2022, the poster was placed on the front page of the Council website. Hard copies of the poster were also put up at the following locations: -

- Newcastle Library
- Kidsgrove Library
- Talke Library
- Clayton Library
- Wilkos, Newcastle
- Guildhall
- Morrisons, Newcastle
- Morrisons, Milehouse
- Morrisons Daily, Clayton
- Aldi, Newcastle
- Sainsbury's, Newcastle
- Little Asda, Morris Square, Wolstanton
- Co Op, Wolstanton
- Co Op, Bradwell
- Co Op Chesterton
- Co Op Waterhays
- Co Op, Whitehills, Kidsgrove
- Co Op, Windemere Road, Clayton
- Red Street Community Centre
- Affinity Outlet, Talke
- Lidl, Kidsgrove
- Tesco, Kidsgrove

1.21. Social media posts were also made via Twitter (now X) and Facebook with copies of the poster provided.

4. First Draft Local Plan Consultation

1.22. The Council consulted on the following documents: -

- First Draft Local Plan (2020 – 2040)
- Interim Sustainability Appraisal (incorporating Equality Impact Assessment)
- Interim Habitats Regulations Assessment

1.23. The Council also published various evidence-based documents online. The draft proposals (draft allocations and designations) were also made available to view via an online First Draft Local Plan Policies Map.

5. Consultation Process

1.24. Consultation on the First Draft Local Plan took place from Monday 19th June to close of business hours on Monday 14th August 2023. Comments were invited on the First Draft Local Plan, Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). In addition to the consultation documents, a formal notice and comments form was also published. An interactive map showing the draft proposals was in addition published on the Council's website.

1.25. Consultation comments could be made using a dedicated online consultation portal (Keystone Objective), via email to the Planning Policy team or by post to the Council Offices at Castle House, Barracks Road.

1.26. The First Draft Local Plan, copies of the HRA and SA alongside copies of comment's forms and a formal notice were made available online and distributed in paper copy to the following libraries:

- Newcastle Library, Castle House, ST5 1BL
- Clayton Library, ST5 3HW
- Silverdale Library, ST5 6LY
- Talke Library, ST7 1RA
- Kidsgrove Library, ST7 1BS
- Knutton Library, ST5 6EB
- Audley Library, ST7 8DB
- Loggerheads Library, TF9 4NX

1.27. The Council maintains a database of stakeholders for planning policy consultations. The Statement of Community Involvement includes details as to how to register and become a member of the planning policy database. The council has also published a privacy notice as to how it will use personal data in relation to planning policy matters. The Statement of Community Involvement also lists several 'specific' and 'general' consultees with representatives of relevant groups present on the planning policy consultation database.

1.28. Statutory consultees and consultees who had signed up to the local plan consultation database received email / letter notification when the consultation went live. E-mail notifications were also sent to Newcastle-under-Lyme Borough Council Councillors, all Town

and Parish Councils in the Borough and Members of Parliament (MPs) whose constituencies lie partly or wholly within Newcastle-under-Lyme Borough Council's administrative area.

1.29. The consultation was promoted through a variety of means. These included:

- Via social media: - a total of 4 Twitter posts (now X) and a total of 7 Facebook posts.
- Updates on the Council website's latest news webpages.
- A video of a Power Point presentation published on the Council's website to explain the Local Plan process. A separate page including a Frequently Asked Questions (FAQs) page was also released online.
- A press release.
- Site notices posted at physical locations where there were site specific proposals included in the Plan. The site notices provided information about the consultation including a link to how comments could be submitted to the consultation.

6. Consultation events

1.30. The council held a total of 11 'drop in' consultation events where officers were available to answer questions and distribute consultation forms etc. Table 3 (below) lists the respective consultation events and the number of confirmed attendees at each event.

Table 3: List of consultation 'drop in' events First Draft Local Plan

Event	Date	Number of attendees who completed a 'sign in' sheet
Silverdale (Library)	22 June 2023	79
Kidsgrove (Town Hall)	28 June 2023	237
Ashley, Loggerheads (Oddfellows Hall)	05 July 2023	40
Audley (Methodist Church)	12 July 2023	191
Madeley (Madeley Centre)	13 July 2023	39
Keele (Village Hall)	20 July 2023	62
Chesterton (Holy Trinity Church)	27 July 2023	57
Silverdale (Methodist Church)	02 August 2023	72
Newcastle-under-Lyme Library (by appointment only)	03 August 2023	11
Bradwell (Bradwell Lodge Community Centre)	08 August 2023	7
Guildhall (NUL Town Centre)	10 August 2023	19

1.31. Most of the 'drop in' events were held for two hours between 5pm and 7pm. The exception was the event at Newcastle-under-Lyme Library on 3rd August where an appointment could be made to speak to a planning officer between 10am – 6pm.

1.32. Copies of the Draft Local Plan, Policies Booklet, Sustainability Appraisal, Habitats Regulations Assessment, leaflets, posters, Frequently Asked Questions and comment response forms were made available at all events.

1.33. Copies of the Draft Local Plan in large print were also made available upon request.

7. Responses to the Consultation

- 1.34. A total of 5,159 individual comments were received from 1,378 respondents during the consultation period. Furthermore, a total of 18 comments, from 14 respondents were made to the Habitats Regulations Assessment and 13 comments from 11 respondents were made to the Sustainability Appraisal.
- 1.35. There were also four recorded petitions submitted to the consultation: -
- “Request NULBC to Review Housing Targets for Local Plan”. 1,857 people have signed the online petition (this petition was considered at Full Council on the 26 July 2023).
 - “Save your Newchapel and Harriseahead Green Belt from housing development” (sites NC77 and NC13) with 88 signatures.
 - “Housing proposals at Red Street, High Carr Farm, Talke Pitts, Butt Lane, West Avenue and Congleton Road”. This petition claimed that infrastructure cannot support the proposed level of development in such a small area and alleges that there are no plans for additional schools or GP surgeries. It contains over 500 signatures.
 - ‘Save Hassell Street Car Park’ submitted by several local businesses on Hassell Street, Newcastle included over 450 signatures.
- 1.36. The significant majority of responses received to the First Draft Local Plan were made via e-mail followed respectively by letter and the online consultation portal (web). Figure 1 (below) shows the % breakdown by method.

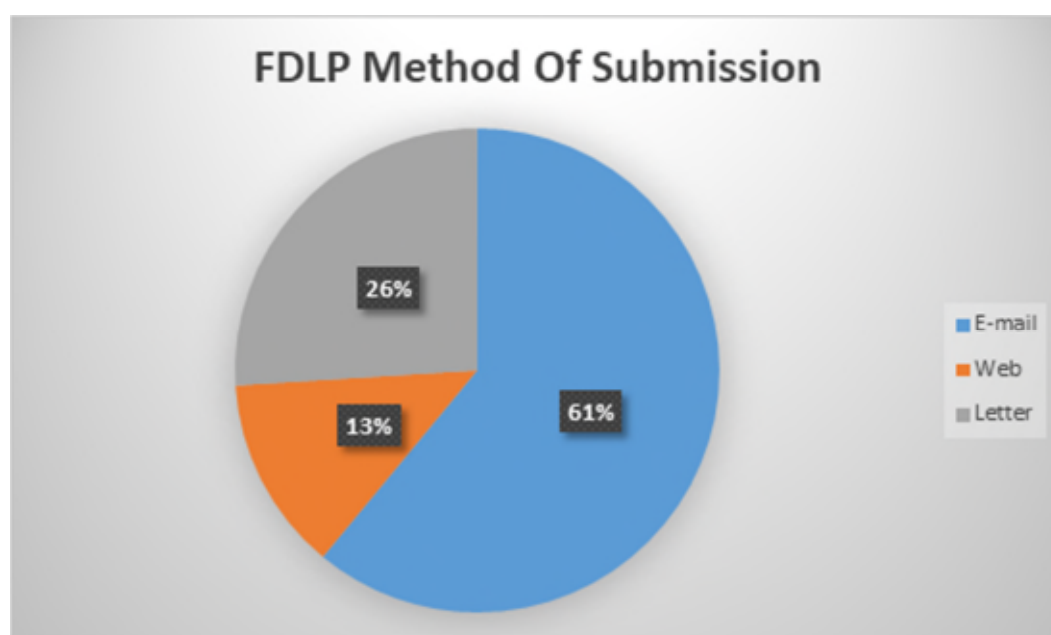


Figure 1: Method of Submission to the First Draft Local Plan

- 1.37. Table 4 below presents a breakdown of comments made to individual parts of the First Draft Local Plan consultation document:

Table 4: Breakdown of individual comments to the consultation document

Section	Number of Comments
Newcastle-under-Lyme First Draft Local Plan 2020-2040 - Overall Document	73
Consultation	50
How to respond to the consultation	10
Introduction	23
Sustainability Appraisal and Habitats Regulations Assessment	10
Current Development Plan	5
Neighbourhood Plans	6
Stages of development of the Local Plan	6
Context	17
Vision and Strategic Objectives	47
Vision for the Borough	11
Strategic Objectives for the Borough	27
Approach to Policies	115
Planning for Sustainable Development	18
Policy PSD 1: Overall Development Strategy	75
Policy PSD 2: Settlement Hierarchy	26
Policy PSD 3: Distribution of Development	68
Policy PSD 4: Development Boundaries and the Open Countryside	47
Policy PSD 5: Green Belt and Safeguarded Land	54
Policy PSD 6: Health and Wellbeing	36
Policy PSD 7: Design	25
Climate and Renewable Energy	13
Policy CRE 1: Climate Change	40
Policy CRE 2: Renewable Energy	26
Housing	13
Policy HOU 1: Affordable Housing	45
Policy HOU 2: Housing Mix, Density and Standards	48
Policy HOU 3: Gypsy, Travellers and Travelling Showpeople	13
Employment	14
Policy EMP 1: Employment	15
Retail	7
Policy RET 1: Retail	10
Infrastructure and Transport	18
Policy IN 1: Infrastructure	58
Policy IN 2: Transport and Accessibility	39
Sustainable Environment	11
Policy SE1: Pollution, Contamination and Amenity	25
Policy SE2: Flood Risk, Water Resources and Management	19

Policy SE3: Water Resources and Water Quality	13
Policy SE4: Open Space, Sports and Leisure Provision	36
Policy SE5: Biodiversity and Geodiversity	22
Policy SE6: Historic Environment	16
Policy SE7: Landscape	18
Site Allocations	380
Approach to Strategic Allocations	11
Table 4: Strategic Locations	410
Residential and Employment Allocations	76
Table 5: Proposed Residential and Employment Allocations	2921
Glossary	5
Appendix 1: Monitoring Framework	6
Supporting Information	1
Appendix 2: Employment Sites in Supply	9
Appendix 3: Borough Council Car Parks in Asset Rationalisation Programme	29
Appendix 4: First Draft Local Plan Site Allocations Maps	43
Total	5,159

Annex 1: Issues and Strategic Options

1. I&O - Q1 Do you agree with the Vision for the Borough? If not, how could the Vision be improved?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> Considered by some including CPRE & developers to be too insular, too limited, parochial, lacking imagination. The Local Plan does not seem to follow the Vision – does not set high enough targets for the Borough to achieve. Place more emphasis on living in town centres. Should contain Vision Statements for individual settlements. Improving/maintaining existing roads & improving network of community transport e.g. mini metro using 'old' railway links Green Belt should not be seen as an opportunity, nor should any development be to its detriment/loss. More emphasis on walking & cycling (public transport/active travel in general) Climate change must be at the heart of the Vision, with environment the main focus, with the assertion that we cannot build out of climate catastrophe. Remove the word 'endeavour' in creating more sustainable places to demonstrate how serious the Local Authority is. Should include desire to protect wild & green spaces. The term 'jobs' should be defined – variety of skilled jobs? Does not reflect the economic reality & changed public health circumstances post Covid. 	<p>The Vision statement in the Local Plan (paragraph 4.1) seeks to articulate a clear and concise expression of the Council's aspirations for the Borough up to 2040. It highlights the delivery of sustainable new homes and jobs to meet local needs whilst providing more opportunities for people to enjoy a high quality of life. The vision has been amended since the consultation at Issues and Options stage.</p> <p>Several respondents considered the Vision to be too insular, lacking imagination and not reflecting the Borough's role in the wider region. The Vision Statement in the Final Draft Plan acknowledges the importance of the Borough in contributing towards regional growth. This is amplified by Strategic Objective SO-2 which seeks to "benefit economic growth for the region", focusing on a range of key employment sectors. The Vision also seeks to deliver a sub-regional exemplar business park at Junction 16 of the M6 Motorway, acknowledging the site's accessibility and potential to attract businesses from across the wider region.</p> <p>Several respondents asked for more specific Vision Statements for individual settlements. Whilst the Vision statement in the Plan relates to the whole of the Borough, policy PSD2 (Settlement Hierarchy) identifies a range of different settlement types each with their own distinct roles and functions. This sets out the key strategic role of Newcastle-under-Lyme Town Centre and its distinctiveness, the complementary role of Kidsgrove as an urban centre and recognises that the rural areas play an important role in the Borough's economy and wider character. Furthermore, in providing a framework for Neighbourhood Plans, the local plan supports communities in setting out their own specific visions and objectives for the future of their area. (SO-8 and supporting information).</p>

	<p>A number of respondents wanted to see a greater emphasis on town centre living. The Plan recognises the importance of promoting sustainable development and seeks to encourage a greater mix of uses within town centres, including residential development. Objective SO-3 specifically references the need to provide "a higher mix of residential" within town centres to create more vibrant and sustainable communities. Policies RET4 (Newcastle-under-Lyme Town Centre) and RET5 (Kingsgrove Town Centre) support a range of development within town centres including new homes.</p> <p>The Council also acknowledges the concerns raised during consultation that the Green Belt should not be seen as an opportunity for development. The Plan seeks to protect the Green Belt from inappropriate development and only supports the release of land from the Green Belt in very limited circumstances, where exceptional circumstances have been clearly demonstrated. Objective SO-12 clearly states that the local plan should "Protect the Green Belt, except where exceptional circumstances justify strategic Green Belt release to meet strategic needs identified by the Plan".</p> <p>The Council acknowledges the concerns regarding climate change, sustainable transport and the protection of green spaces. The Plan addresses these concerns through several Strategic Objectives including:</p> <ul style="list-style-type: none"> • SO-1: Which advocates for development which "naturally enhances human health and well-being through utilising sustainable construction methods, facilitating healthy lifestyle choices and supporting sustainable transport connections". • SO-4: Which aims to "reduce the Borough's carbon footprint and mitigate the impact of climate change". • SO-7: Which seeks to "support and enable active and sustainable travel across the Borough".
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	<ul style="list-style-type: none"> • SO-9: Which seeks to “Maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages”. • SO-12: Which promotes "protecting the Green Belt". <p>The Council is committed to delivering a high quality of life for all residents and ensuring that new development is sustainable and respects the Borough’s environmental assets. The Local Plan, through its policies and the framework it establishes for decision-making, seeks to reflect the aspirations articulated in the Vision statement and to create a prosperous and sustainable future for the Borough.</p>
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2. I&O - Q2 Do you agree with the Strategic Objectives? If not, how could these be improved?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Poorly drafted & contains weakened commitments, not specific enough, too generic. • Alignment to Vision is not absolute. • Include a Strategic Objective on historic environment. • Emphasis on brownfield sites & town centre development is not strong enough. • Lack of clarity in terminology e.g. aspirational housing, re-imagination of town centres, enabling balanced growth etc. • Terms such as where possible, subject to viability & deliverability should be removed, although some parties thought there were valuable. • Objectives contradict each other - climate change, environment & development ambitions. • Confusion as to whether the Strategic Objectives are in priority order. • Development on Green Belt concerns were a very common theme. • Lack of understanding re: what constitutes Exceptional Circumstances. • Distribution & Logistics should not form part of the sectors for growth. • Audley & Keele numerous site-specific concerns including Strategic Employment & the Golf Course. • Relationship to Neighbourhood Planning. • Infrastructure capacity & environmental damage concerns. • Desire for preservation of all green spaces. 	<p>The Strategic Objectives (paragraphs 4.4 to 4.16) seek to deliver the Vision.</p> <p>Objective SO-13 (XX) in the Final Draft Local Plan considers the historic environment.</p> <p>Respondents wanted to see a greater emphasis on town centre living. The Plan recognises the importance of promoting sustainable development and seeks to encourage a greater mix of uses within town centres, including residential development. SO-3 specifically references the need to provide "a higher mix of residential" within town centres to create more vibrant and sustainable communities. Policies RET4 (Newcastle-under-Lyme Town Centre) and RET5 (Kidsgrove Town Centre) support a range of development within town centres including new homes.</p> <p>The strategic objectives are not presented in priority order.</p> <p>SO-8 (VII) considers the support for neighbourhood planning.</p> <p>The Council notes the comments relating to SO12. In exhausting options for development on non-Green Belt land, the Council will look to make as much use as possible of suitable brownfield sites and underutilised land, optimise the density of development, and discuss with neighbouring authorities about the potential to meet some of the Borough's needs. Exceptional circumstances for Green Belt amendments are highlighted within the NPPF (Para 140). The summary of the Council's exceptional circumstances case is set out in the Housing Spatial Strategy Topic Paper</p>

	[ED031, 5.40 - 5.48] and Employment Spatial Strategy Topic Paper [ED033, 5.12 - 5.15]
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3. I&O - Q3 Do you have specific comments to make with regard to this chapter [housing and economy]?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> Challenges to population statistics, stagnated employment and impact of the pandemic which results in suggestions that no new housing is required. Should only utilise brownfield sites and sites in the town centre/regeneration sites for new housing, and not Green Belt or green field land. Calculations should be refreshed in light of the 2021 census and to reflect the impact of the pandemic. Opposition to development on Green Belt land and at J16 and in Audley Parish. No need for new warehouses when the calculations show we have surplus employment land. Some suggestions that this surplus should be used for housing. Some suggestions that warehousing will only provide low skilled jobs. Concern over the impact of housing on infrastructure, particularly the transport network. Government targets are overestimates and should be challenged in line with a clause in the NPPF. Some scepticism over the findings of the housing and economic needs assessment, particularly the case for higher growth scenarios. Suggestions that the chapter could have been written more clearly, or that there were issues with the interpretation of data. Some support for new home building to reflect the findings of the housing need assessment and to address past under delivery. Support also for maintaining a 5-year supply of housing. 	<p>The Council has published a Housing and Economic Needs Assessment (2024) which has reviewed the development requirements of the borough in line with the latest evidence available. The findings of this study have been considered by the Council in defining the overall development requirements identified in the Local Plan.</p> <p>Several options in terms of the overall levels and distribution of development have been considered through the development of the Local Plan, including the Sustainability Appraisal. This is documented in the Plan Strategy Housing Topic Paper [ED031] and Employment Topic Paper [ED032] respectively.</p>

4. I&O - Q4 Which option for growth is the most appropriate to use in the Local Plan?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> Majority support for option 1 – national minimum, standard methodology target. This option was considered to have a lesser impact on infrastructure and was more in line with past delivery. A large number of respondents disagreed with any housing growth, some suggested challenging the government target on the basis of Brexit, the pandemic, population, stagnant employment, the 2021 census or they disagreed with the need. Once all brownfield sites were developed there was no need for further development. Some suggested growth is at odds with mitigating against climate change. Some suggested higher growth scenarios were deliberate to justify Green Belt release. Safeguard Green Belt land and build in town centres and brownfield first. Some respondents, mainly representatives of landowners or the development industry agreed with the justification in the housing and economic needs assessment for targets above the standard methodology and put forward detailed reasons for support, for example to address past under delivery, to support economic growth, in line with modelling. Should focus more on town centre regeneration, housing mix not number, and the type of employment development needed. Bring empty homes back into use. 	<p>The Council has published a Housing and Economic Needs Assessment (2024) which has reviewed the development requirements of the borough in line with the latest evidence available. The findings of this study have been translated into the overall development requirements identified in the Local Plan.</p> <p>Several options in terms of the overall levels and distribution of development have been considered through the development of the Local Plan, supported by the Sustainability Appraisal. This is documented in the Plan Strategy Housing Topic Paper [ED031] and Employment Topic Paper [ED032] respectively.</p>

5. I&O - Q5 Do you agree with the proposed hierarchy of centres? If answering no, why?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Generally even response – slightly more than half the respondent's that answered the quantitative question do support the hierarchy. • Many respondents supported the hierarchy in principle but had one or two main points of disagreement which meant they couldn't overall mark support for the hierarchy - essentially a yes and no answer. • The hierarchy does not reflect proposals in the plan which focus on large scale rural development. • Prioritise development in urban centres, particularly town centres, protect the Green Belt and villages. • Some disagreement with the District Centres identified and concern over further development of these. • Some disagreement or issues associated with Baldwin's Gate and Betley and Wrinehills proposed classification of a rural centre from those Parish Council's and some other respondents. • Concern over the link between position in the hierarchy and link to the level of development that could come forward. Some suggested infrastructure and capacity had not been given sufficient consideration. • Thistleberry missed from list of centres. 	<p>The settlement hierarchy in the Final Draft Local Plan has been further refined following feedback received at the Issues and Options Stage. Policy PSD2 in the Final Draft Local Plan sets out the settlement hierarchy, informed by the assessment undertaken in the Rural Topic Paper [ED005] in relation to the level of services and facilities available and informs the consideration of levels of growth for that area. Separately, a retail hierarchy has been established in policy RET 1 in relation to the consideration of retail and leisure uses and the designation of retail boundaries etc.</p>

6. I&O - Q6 Do you have suggestions for new development sites within development boundaries? Please see the evidence base & topic papers webpages (link below) for maps of all existing development boundaries

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> Some site suggestions were put forward for consideration either land/sites that had been observed or sites being promoted through the Local Plan process. Not all respondents were clear on whether the sites were in the development boundary or provided information about the ownership of land. Many non-specific site suggestions were put forward seeking for the Council to examine all derelict land, vacant and commercial premises, brownfield land and surplus employment which could be converted to residential, empty homes. The majority of comments objected to consideration of release of Green Belt land. Some comments acknowledged the position that there is limited land supply remaining for development in the urban area. General agreement with the process of exhausting land within development boundaries before consideration of other sources of sites. suggestion that the land supply from within the existing urban area should be properly scrutinised through the Local Plan process to ensure that sites relied upon within the supply will come forward during the plan period, and that sufficient flexibility is built into the supply to deal with any potential non-delivery. Some criticism of the difficulty in viewing the current development boundary maps. 	<p>The Council has published and implemented a settlement boundary review [ED 007]. The outcomes of this are reflected in the Policies Map associated with the Local Plan.</p> <p>Sites put forward through the call for sites process have been considered through the Strategic Housing and Employment Land Availability Assessment [ED006] and site selection report and assessments [ED029]. For the Final Draft Local Plan, a PDF version and an interactive version of the map was prepared to support the interpretation of the proposals contained in the Local Plan.</p>

7. I&O - Q7 Are there any areas in Newcastle-under-Lyme, Kidsgrove and within the development boundaries of Rural Service Centres that should be protected from development?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> Some specific spaces were highlighted, mostly areas of nature reserves, open space or recreational land. Many highlighted the need to protect open space within built up areas and spaces such as conservation areas, locally designated green spaces, schools playing fields, allotments and recreation grounds. Many highlighted land in the Green Belt to protect including specific suggestions including the former municipal golf course at Keele and land around Audley Parish. Some mentioned agricultural land including specific landholdings. Consider brownfield first. The benefits of protecting green spaces were often highlighted to health, wellbeing, nature and climate change. Existing boundaries should be protected and only allow development in line with Neighbourhood Development Plans. Issues associated with loss of green space were highlighted including pressure on infrastructure and climate change. 	<p>The Council has within the Final Draft Local Plan established a policy framework (both strategic & non-strategic) that collectively addresses aspects including the protection (& where appropriate. mitigation) of the borough's amenity, character and heritage. Nature conservation interests & specific environmental designations are also integral to this, as elucidated in particular by the Sustainable Environment section of the Local Plan (SE prefix policies 1-14).</p> <p>The evidence base used to inform this approach, encompasses (but is not limited to), ED07 Settlement Boundary Review; ED012 Playing Pitch Strategy; ED013 Strategic Flood Risk Assessment; ED015 Heritage Topic Paper; ED020 Nature Recovery Network Mapping Report; ED021 Newcastle-under-Lyme and Kidsgrove Urban Capacity and Town Regeneration Study; ED022 Open Space & Green Infrastructure Strategy.</p>

8. I&O - Q8 Which option/s for expansion do you support?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> There were several consultees that did not support any of the growth directions. The reasons are as follows: <ul style="list-style-type: none"> There is a belief that brownfield sites are available in non-Green Belt locations to accommodate growth. Development should be in accordance with the Hierarchy of Centres, focusing on non-Green Belt locations within Urban Centres, Rural Centres, Neighbourhood Centres and Villages. There was concern Green Belt release would negatively impact the rural character and countryside. Furthermore, the rural area does not have the road / highway infrastructure to accommodate growth. Existing services and facilities are already constrained with capacity issues. A greater proportion supported either growth directions 1, 2 and 6. The reasons are stated below: <ul style="list-style-type: none"> Growth Directions 1 and 6 encourage development of brownfield sites, and within defined centres in accordance with the hierarchy. Suggested development opportunities exist at Ryecroft, Roebuck Centre, Mid Way and numerous units above retail shops within the town Centre. Growth directions 1 and 6 encourage a more even distribution of growth across the Borough, and impacts of development would be minimised in comparison to larger and fewer sites at a specific location. This approach would help to maintain a housing supply in the medium and long term. The countryside and agricultural land should be protected. 	<p>The Council has considered several options in the development of the Local Plan, supported by the Sustainability Appraisal. Growth Direction 6 (Hybrid approach) has been taken forward for the reasons outlined in the employment and housing plan strategy topic papers (ED031/ED032 respectively).</p>

<ul style="list-style-type: none"> • Some considered growth direction 2 as a suitable option because Keele has existing development and infrastructure to accommodate future growth (i.e. university, employment, and transport connections to Newcastle Town Centre). • An urban extension at Keele would attract workers at the university and Science and Business Park to live within the area. This would encourage more sustainable modes of transport and less vehicle usage. Furthermore, development would support the growth of the University. • An extension at Keele would provide the opportunity to deliver affordable housing. • Growth directions 3, 4 and 5 were less favoured in comparison to the others. However, some supporting comments were made: <ul style="list-style-type: none"> ○ Growth direction 3 was considered suitable because Talke and Chesterton have existing infrastructure (retail, employment provision, transport connections) to accommodate growth. The proximity of housing and employment would encourage sustainable modes of transport and less vehicle usage. ○ Growth direction 3 provides opportunities to enhance access and extend public transport routes between proposed development, Newcastle and Kidsgrove Town Centre, and Kidsgrove Railway Station. ○ Growth Direction 4 was considered suitable as Kidsgrove has existing infrastructure, services and facilities (i.e. shops, schools, community centres etc). This growth option provides the opportunity to expand and upgrade Kidsgrove Railway Station, and to enhance transport connections associated with it. ○ Growth at Kidsgrove would support neighbouring rural settlements such as Mow Cop. ○ There are development opportunities at Slacken Road, Kidsgrove. 	
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<ul style="list-style-type: none"> ○ Growth direction 5 was least supported. However, it was highlighted that Audley has a minimal retail and employment offer. Previous industries such as coal mining have disappeared, and opportunities in agriculture are limited. Growth at Audley would help to address this and provide greater employment opportunities. 	
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9. I&O - Q9 Which option/s for expansion do you disagree with?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> ○ There were several consultees that disagreed with all six growth directions for the following reasons: <ul style="list-style-type: none"> ○ Growth in the Green Belt would result in the loss of agricultural land, open / green space, biodiversity, and amenity. ○ The loss of Green Belt would impact the environment's ability to mitigate climate change through carbon sequestration. ○ It is believed there are plenty of development opportunities on brownfield sites (e.g. warehousing / industrial sites) in non-Green Belt locations. Empty and vacant properties should be prioritised, especially within Town Centres before considering new development. ○ Development in the Green Belt would result in a greater reliance of vehicle travel, and not encourage sustainable modes of travel across the Borough. Increases in traffic, congestion and pollution would occur. ○ Proportionately, disagreement was evenly spread between the individual growth directions. For each growth direction, the reasons for were as follows: <ul style="list-style-type: none"> ○ Growth Direction 1 would result in increasing car journeys which would then increase traffic, congestion and pollution. ○ Large scale rural extensions would encourage urban sprawl into rural areas across the Borough. ○ Growth direction 2 would result in the merging of Keele and Silverdale, losing their respective individual identities and undermining the function of the Green Belt. ○ Growth at Keele would impact on the historic, heritage and natural environment. 	<p>The Council has considered several options in the development of the Local Plan, including through the Sustainability Appraisal. Growth Direction 6 (Hybrid approach) has been taken forward for the reasons outlined in the employment and housing topic papers (ED031/ED032 respectively).</p>

<ul style="list-style-type: none"> ○ Development at the former Keele Golf Course would impact the ability to mitigate climate change and increase carbon sequestration on Council owned sites as suggested in the AECOM report. ○ Keele has already witnessed growth at the Hawthorns and Hamptons sites. The existing road / highway network cannot accommodate further growth. Parking provision is an existing problem. ○ The university's growth aspirations were questioned due to the pandemic. ○ Suggestions were made that the pandemic has altered the demand for student accommodation and housing around Keele. The lack of demand for student housing could also free up units for the housing market. ○ Growth direction 2 contradicts the local plan objectives SO-II and SO-X. ○ It is viewed that improvements are required to the existing road / highway network including the A500 and A34 to accommodate development at Talke and Chesterton under growth direction 3. Currently, there are limited pathways, cycleways and public transport connections across the area. ○ Growth direction 3 would bring the settlements of Talke, Chesterton and Audley closer together, and would diminish their individual character and identities. ○ Further development at Talke and Chesterton would place greater existing pressures on services and facilities including schools and healthcare. ○ There is a variety of open and green spaces hosting an abundance of wildlife and biodiversity. Sites include Parrots Drumble Nature Reserve, Bathpool Woods and Bradwell Woods. Development would have an adverse impact on these sites. 	
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<ul style="list-style-type: none"> ○ Growth direction 4 would lead to urban sprawl and the merging of Kidsgrove, Harriseahead, Mow Cop and Stoke (i.e. Goldenhill) to the north-east, and Kidsgrove and Alsager to the north-west. This undermines the purpose of the Green Belt. ○ Growth direction 5 was of particular interest with more detailed comments in comparison to others. There were concern about the cumulative impact of housing and employment development at Audley under growth direction 5. ○ Growth at Audley would severely impact the open and rural character of the parish and the settlements within it. Urban sprawl would result in the merging of settlements within Audley, thereby losing their individuality and identities. Furthermore, growth would impact on the historic (Conservation Area) and natural environment (loss of biodiversity). ○ The existing road / highway network does not have the capacity to accommodate further housing and employment development. Roads within Audley are narrow and would increase traffic, congestion and pollution (air and light). Parking provision is an existing problem. ○ Proposed growth would undermine Audley's status and a Rural Service Centre, and the aims and objectives of the emerging Neighbourhood Development Plan. It contradicts local plan objective SO-IV, and would not be compliant with part 2.8 of the NPPF. ○ It was suggested that Audley is already a sustainable location given its status as a Rural Service Centre, and therefore growth is not required. Church Street hosts a variety of retail services (e.g. hairdressers, supermarket, restaurants, library, doctors (latter oversubscribed) etc. 	
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<ul style="list-style-type: none"> ○ Numerous consultees expressed their disapproval with the allocation of strategic employment site (AB2) stating it was not in keeping with Audley in terms of density, type and design of development. The site is viewed currently as open space used for leisure and recreational purposes (i.e. walking, horse riding etc). ○ Site AB2 currently has no public transport connections (e.g. bus travel), and the surrounding road / highway infrastructure is not HGV compatible. ○ It is perceived that jobs created will be low skilled and low paid, and would not benefit the residents of Newcastle-under-Lyme due to the site's location bordering Cheshire East. Neighbouring employment developments in Crewe and Alsager (e.g. Radway Green) was often highlighted as a reason to not allocate site AB2. 	
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10.I&O - Q10 Are there any alternative options which require consideration?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Many of the alternative options suggested were made up of components already forming parts of the existing six growth directions. Other suggestions moved away from housing and employment growth entirely. The following suggestions were made: <ul style="list-style-type: none"> ○ No Green Belt release at all, and to build in non-Green Belt locations and on brownfield sites. Development should be considered on surplus commercial and industrial land. Redevelopment opportunities at Ryecroft and Roebuck Centre are examples. Refurbishment of empty, derelict and abandoned building (i.e. retail units and residential properties) should be considered. Bring back the 1000+ empty properties into use within the Borough. ○ Development should be focused in accordance with the Hierarchy of Centres, with the Urban Centres (Newcastle and Kidsgrove) being the first point of call, followed by the District Centres, Neighbourhood Centres and then villages. Priority should be made to improve the health of the town centres. Reduce business rates and rents and ensure completion of unfinished developments (e.g. Nelson roundabout – Sky Building) before building elsewhere. ○ Equal amounts of growth across the Rural Service Centres and other rural settlements - Madeley, Betley, Keele, Baldwins Gate, Loggerheads and Audley. ○ Greater dispersion of development would have less impact in comparison to a large single strategic site. ○ A combination of smaller sites adjacent to existing settlements and strategic sites. This would help to 	<p>The Council has considered several options in the development of the Local Plan, supported by the Sustainability Appraisal. Growth Direction 6 (Hybrid approach) has been taken forward for the reasons outlined in the employment and housing plan strategy topic papers (ED031/ED032 respectively).</p>

<p>maintain a housing supply within the Borough in the medium / long term. Another suggestion was strategic sites only within sustainable rural areas.</p> <ul style="list-style-type: none"> ○ To continue development to fulfil Policy ASP5 which seeks to address the failing housing market through focusing development in Newcastle and Kidsgrove Town Centre, Silverdale, Thistleberry, Knutton, Cross Heath, Chesterton, Clayton, Westlands, Seabridge, May Bank, Wolstanton, Porthill and Bradwell. ○ Focus development along the A500 and A34 corridors. Development opportunity at land east of the A34 between High Carr and the A500. ○ Optimise and uplifting the density of development within the urban area and town centres. Consider building upwards rather than outwards to use less land. ○ If Green Belt was to be released, the weaker performing sites should be developed on. ○ Focus on a long-term sustainable approach rather than development alone. The climate emergency and environmental protection should be the priority. ○ Growth should be target where identified within Neighbourhood Development Plans. ○ Fulfil the development needs and growth through Duty to Co-operate – Stafford, Stoke-on Trent, Shropshire, Cheshire East, Staffordshire Moorlands. ○ Central Government should be challenged in terms of their national growth targets. 	
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11. I&O - Q11 Should development in the rural area be spread equally across the Rural Centres? If not, how should growth be distributed in the rural area?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • The majority that responded quantitatively (66%) suggested that development should not be spread equally. • A high number of respondents suggested that evidence and unique factors to each settlement including local need, history, infrastructure capacity, and character should be considered. • Development should be balanced and proportionate to reflect the character and identity of settlements. • Some mentioned planning gains should be taken into consideration which align with economies of scale in terms of housing numbers. • Comments supporting an urban first approach, protecting the rural area from over development. • Support for small scale and infill development. • Concern about impact on the rural road network and additional commuting. • For those that did support equally spreading growth this was often in the context of fairness and only after other options had been exhausted. • Should be in line with Neighbourhood Development Plans. 	<p>The Council has considered several options in the development of the Local Plan, including through the Sustainability Appraisal. Growth Direction 6 (Hybrid approach) has been taken forward for the reasons outlined in the employment and housing plan strategy topic papers (ED031/ED032 respectively)</p>

12. I&O - Q12 Do you have suggestions for potential Gypsy & Traveller sites which are deliverable?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Very few site suggestions were put forward. Walleys Quarry, extension to the existing site at Cemetery Road was the most popular suggestion. The former municipal golf course at Keele and a couple of further observations of potential sites were put forward but there was no formal site submissions or sites put forward by landowners. • Many suggested talking to the Gypsy and Traveller community to identify sites. • Some supported addressing the needs of this community, some expressed concerns or suggested there was no need, or the need should not be differentiated from general housing need. 	<p>The NPPF makes clear the importance of Local Authorities addressing the 'need for housing in different groups in the community, including for Gypsy and Travellers' (paragraph 63).</p> <p>The Council commissioned a 2024 update to the Gypsy and Traveller Accommodation Assessment ("GTAA", 2020) to ensure that the council has a robust evidence base to determine an appropriate level of pitch and transit provision over the plan period.</p> <p>The Council has also produced a site selection report [ED019], where sites put forth in the call for sites have been considered. The council also investigated expansion of existing sites including Cemetery Road, however this option is not viable as it has not been promoted to the Council for further consideration [ED019, page 7].</p>

13. I&O - Q13 Which option should the Council use to address the need for transit provision?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none">• There was a limited response to this question. Of those that responded, the most supported options were for a negotiated stopping policy or a transit pitch with 3-13 pitches.• Most responded 'other' and suggested talking to the Gypsy and Traveller community to determine what the best solution was, or suggested a mix of the options to address transit provision, as opposed to one solution.• There were some suggestions that any transit site required defined rules, there was a suggestion that sites on Council owned land could be better controlled.• One suggested the need was underestimated, whilst another suggested there was no need.	<p>The Gypsy and Traveller Accommodation Assessment ("GTAA", 2024) recommended that the Council consider a negotiated stopping policy and approach to address Transit need in the Borough. The Council is currently considering stopover places and negotiated stopping arrangements for council owned sites.</p>

14. I&O - Q14 Should the Local Plan set an alternative target for affordable housing to the national minimum (10%)?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Some were content with the national minimum of 10% affordable housing. However, there was greater support for setting an alternative target above the 10% requirement. • The West Midlands Housing Association Planning Consortium provided detailed justification for a higher affordable housing target. • Suggestions of 15% and 25% affordable housing was made. A tiered approach was also suggested starting with a minimum of 15%. • Many discussed low-income households and first-time buyers cannot afford to get onto the property ladder, and this is a reason for increasing the affordable housing requirement. • There was the view that the affordable housing target should reflect the local needs of the settlements and Borough as a whole. • Developers should develop not just for financial gain. They should comply with the affordable housing triggers and requirements associated with new housing development. • From a developer's perspective, the affordable housing contributions should not render development schemes unviable. 	<p>The Council's approach to affordable housing is set out in policy HOU 1 (Affordable Housing) which includes a graded approach to affordable housing provided for brownfield sites of 15 or 25% based on location and 30% for greenfield sites. The Council's viability study [ED04] notes the importance of including criterion 5 of the policy HOU1, which states that financial viability assessments will be considered and independently appraised where it has been justified that the proportion of affordable housing sought would not be viable.</p>

15.I&O - Q15 Do you agree with the general ratio of 5% social rented, 2.5% first homes and 2.5% flexibility to make up the composition of affordable homes on qualifying sites?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Some considered first homes should be prioritised. • Some felt the ratio for affordable housing should be higher than 10% to help people to access the housing market and to reduce poverty. Suggestions for 30% and 50% put forward. • Suggestion for more local housing need surveys to inform policy. • Some support from the development industry for 10% affordable ratio. The level should only be based on what the market can sustain. • Tiered system suggested based on the land value as this differs across the borough. • Some support for models which enable eventual full private home ownership. • Some concern on the social rented element, how this will be delivered. • The West Midlands Housing Association Planning Consortium highlighted that the ratio of tenures is not compatible with national policy. • A detailed late representation was received from Aspire. 	<p>The Council's policy HOU1 Affordable Housing notes how the tenure split for affordable housing should be provided in line with latest evidence. The supporting text confirms that the Housing Needs Assessment [ED001] has considered the tenure split and figures are included in the supporting text, as a starting point, for relevant schemes to consider.</p>

16.I&O - Q16 How should the Local Plan help to deliver accommodation for older and disabled people and the specific needs of other groups?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Several observations were made that older people's accommodation should be located with good access to services and facilities. This included healthcare and retail shops. • More evidence and community consultation required with carers and elderly required to understand housing solutions. • Help older people remain in their homes and to be independent. • Encourage private providers to develop buildings and offer high quality care. • Increase social renting. • Schemes such as extra care, retirement villages, co-housing sites, lifetime homes standards. • Encourage community led development. • Promote integration of different groups and avoid creating ghettos. • No further student accommodation is required. • Specific need and allocations for C2 uses required. • Need for larger family housing. 	<p>The policy approach of the Local Plan includes Policy HOU3 (housing standards) which states that on major residential developments and specialist housing for older people, 10% of market dwellings should meet the requirements of Building Regulations Part M4 (3) (2) A wheelchair adaptable homes standard and 10% of affordable / social rented housing should meet the requirements of Part M4 (3) B accessible homes standard (or Government equivalent), where there is a demonstrable need in the local area. Policy HOU5 (specialist needs housing) also sets out the policy approach for new care homes and specialist accommodation.</p>

17.I&O - Q17 Do you think a strategic employment site should be allocated in the Local Plan?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Significant focus on the proposals at Junction 16, M6 in so far as they could impact on Audley and the surrounding localities. • Extensive submission from promoters of Junction 16, M6 detailing its merits & supporting evidence. • Capacity of infrastructure would be far exceeded. • Major negative impacts on biodiversity & green belt loss. • Such proposals contradict climate change objectives & settlement hierarchy. • Rather than a single large site, the focus should be on a series of smaller sites potentially tied in with existing employment areas/more central locations. • Existing empty units should be utilised first. • Air, noise & light pollution consequences. • Enough sites need to be allocated to flexibly support employment opportunities. • Schemes within adjacent Local Authorities offer similar development types as well as alternative, more sustainable, transport methods such as rail hubs. Further expansion at Chatterley Valley also advocated. • Focus should be on higher value industries. • Detrimental to the identity of settlements & the Parish would not directly benefit. • Extensive car borne in-commuting. • The benefits to the affected areas would be very limited/non-existent. • Such schemes should be focussed on areas of higher unemployment than within Newcastle under Lyme. • Areas should be retained for agriculture and leisure pursuits. • Enhanced graduate retention benefits potentially accrued from further development at Keele. 	<p>The merits or otherwise of allocating strategic employment site(s) in the Local Plan was evaluated within the Strategic Employment Site Assessment 2023 (ED002a), & its 2024 update (ED002). This considered three distinct locations, two of which (AB2 & KL15) are allocated within the Final Draft Local Plan. Issues of employment land supply more generally are detailed as part of ED001 Housing & Economic Need Assessment 2024.</p> <p>Within the Final Draft Local Plan, AB2 & KL15 each has a discrete policy to set the parameters for their respective development (as part of Section 13 Site Allocations). This addresses a breadth of issues such as green infrastructure, access and heritage impacts that will serve to positively shape the proposals and mitigate as far as possible any consequent harm.</p>

<ul style="list-style-type: none"> • There remains areas undeveloped within the University that should be exploited first, with considerable capacity remaining for growth. • Hub for technological business growth at Keele seen as having value & potential. • The Local Plan does not set out a clear rationale for a new strategic employment site and more cooperation is needed with the adjoining boroughs. • The Local Plan evidence base does not reflect the post-Covid economic environment. • Staffordshire County Council highlights that Keele Science & Innovation Park remains one of their flagship employment sites and supports plans for its continued development. They also support the notion of the development of a site at M6 J16. 	
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18. I&O - Q18 Should Site AB2 – Land south east of Junction 16 be considered for Green Belt release?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • A strong majority were not in favour of site AB2 being released from the Green Belt. The reasons are stated below: <ul style="list-style-type: none"> ○ Existing employment development already located at Crewe and Alsager (i.e. Radway Green). The abundance of employment development will have cumulative impacts. ○ Concerns were made that the existing road and highway network cannot accommodate the proposed growth for housing and employment. Roads are narrow within the settlement of Audley which would cause traffic and congestion. Local roads are not suitable for HGV traffic. ○ Growth would result in increasing vehicle usage, which turn would cause greater noise and air pollution. ○ Site AB2 is viewed as a valuable green space and is used for recreational purposes, i.e. walking, cycling, horse riding. ○ Development would result in the loss of agricultural land and biodiversity (habitats and species). Furthermore, development would have a negative impact on the rural and landscape character of Audley. ○ The development of site AB2 would contradict the Local Plan objectives SO-I, SO-II, SO-IV, SO-VI, SO-XI and SO-XIII. ○ Part of the site falls within Flood Zones 2 and 3. Development would cause further flooding. ○ Employment development on site is associated with lower waged and lower skilled jobs (i.e. warehousing). This is not aspirational for the Local Plan. 	<p>The merits or otherwise of allocating strategic employment site(s) in the Local Plan were evaluated within the Strategic Employment Site Assessment 2023 (ED002a), & its 2024 update (ED002). Within this, AB2 was one of three sites assessed for their potential to satisfy sub-regional needs, reflect market views on demand, and also a detailed assessment of the potential sites, considering market signals, physical indicators, and sustainability factors. The site has also been appraised against the five Green Belt purposes set out in national policy within the Green Belt Assessment (Part 4) ED008. Dialogue with neighbouring authorities (including Cheshire East Council) has, & will continue to be, undertaken as part of the Duty to Cooperate as set out in ED025, allied to Statements of Common Ground being drafted between parties.</p> <p>Within the Final Draft Local Plan, AB2 has a discrete policy to set the parameters for its respective development (as part of Section 13 Site Allocations). This addresses a breadth of issues such as green infrastructure, access and heritage impacts that will serve to positively shape the proposals and mitigate as far as possible any consequent harm.</p>

19. I&O - Q19 Should site KL15 -Land to the south and east of new development site, Keele University be considered for Green Belt release?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Emphasis should be more on climate change than economic growth. • Presents a positive opportunity if sustainable building techniques were employed and the site was developed sensitively e.g. green roofing with full consideration of biodiversity aspects. • Flora & fauna and significant recreational value of the site is significant. Geology may also be an issue. • Opportunity to build upon the existing infrastructure owing to its proximity to the town centre & symbiosis with the higher education facility. • Serve to encourage high skilled, well-paid roles to the area and this aligns with SSLEP evidence base. • Ongoing dialogue between the University & the Local Authority should be maintained. • Full justification should be provided to establish the need for the expansion. • Absence of detail, such as Keele Masterplan not being publicly available, makes forming a view difficult. Environmental impacts also need to be fully evaluated. • The University has ample land to the south toward Newcastle that is developed in readiness for buildings. • Infrastructure pressures for existing community which are already exacerbated by Walley's Quarry. • Flood risk concerns. • Alternative sites such as Ryecroft would present better options for expansion of the University. • Any loss of green belt should be accompanied by opportunities for improvement being maximised, with impacts minimised and mitigated as far as possible. 	<p>The merits or otherwise of allocating strategic employment site(s) in the Local Plan are evaluated within the Strategic Employment Site Assessment 2023 (ED002a), & its 2024 update (ED002). Within this, KL15 was one of three sites assessed for their potential to satisfy sub-regional needs, reflect market views on demand, and a detailed assessment of the potential sites, considering market signals, physical indicators, and sustainability factors. The site has also been appraised against the five Green Belt purposes set out in national policy within the Green Belt Assessment (Part 4) ED008.</p> <p>Within the Final Draft Local Plan, KL15 has a discrete policy to set the parameters for its respective development (as part of Section 13 Site Allocations). This addresses a breadth of issues such as green infrastructure, access and heritage impacts that will serve to positively shape the proposals and mitigate as far as possible any consequent harm. A masterplan led approach will also be integral to delivery of the site.</p>

<ul style="list-style-type: none"> • Will serve to coalesce Keele Village with other areas such as Seabridge & Westlands. This is challenged by the University itself who also contest that it's not a valued landscape and would involve a limited release of countryside. • Historic England have concerns as to heritage impacts. • Presence of a high voltage cable would be expensive to re-route underground. • Existing congestion problems would be exacerbated. Add to pollutant levels in Newcastle under Lyme town centre. • The site is not of strategic scale & should not in any way be considered as an alternative to the proposals for J16, M6. • Additional sites are promoted for residential purposes that it is argued would complement the expansion of the University. • Release of further land in the University Growth Corridor advocated for high quality and accessible new residential development, to support the attraction and retention of employees, academics and future graduates as part of a mixed sustainable settlement for the Borough. 	
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20.I&O - Q20 Do you agree with the key principles of development boundaries?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Of those that responded, most (62%) supported the key principles of development boundaries. • Support for boundaries that prevent settlement expansion or building on green spaces and the Green Belt. • Boundary maps need to be provided as there isn't clarity on the boundaries. • Boundaries are not appropriate for every settlement – for example where a boundary would be ill defined. • Support for boundaries which protect Audley and Keele. • Some suggested boundaries need to change to reflect new allocations in the Local Plan, others did not want to see boundaries change to accommodate growth. • Some disagreed with the list of areas which should be excluded from the development boundary. • Suggestion that the term built up area boundaries is more appropriate. • Suggestion that any adjustment should be overseen by Neighbourhood Plan groups. • Make use of sites temporarily built on rather than exclude them. • Support for an alternative criteria-based approach which would enable more flexibility. 	<p>The responses received to the question regarding development boundaries during the Issues and Strategic Options consultation have been carefully considered and have directly informed the council's approach to development boundaries in the Regulation 19 version of the Local Plan.</p> <p>Most respondents expressed support for the key principles of development boundaries. This feedback, in line with the analysis in the Settlement Boundary Review (ED007), reinforced the council's view that development boundaries are essential tools for managing growth sustainably, protecting valuable green spaces (including the Green Belt), and providing certainty for residents and developers. Policy PSD4 'Development Boundaries and the Open Countryside' of the Plan, clearly articulates this approach by defining development boundaries and outlining the criteria for development within those boundaries and in the open countryside.</p> <p>Recognising that development boundaries may not be appropriate for every settlement, the council has adopted a context-specific approach, as recommended in the Settlement Boundary Review. The Plan utilises clearly defined boundaries for the Strategic Centre, Urban Centre, and Rural Centres (Policy PSD2 and Appendix 7), reflecting their varying roles, functions, and levels of service provision. Outside these designated areas, Policy PSD4 establishes a criteria-based approach to assess development proposals in the open countryside. This allows for necessary development whilst ensuring sensitivity to local character and environmental considerations.</p> <p>The Plan actively encourages community involvement in shaping development. Policy PSD4 recognises the role of Neighbourhood Plans in</p>

	<p>proposing adjustments to development boundaries within their designated areas.</p> <p>Concerns about the lack of clarity regarding existing development boundaries have been directly addressed. The Plan provides detailed and accurate maps delineating the boundaries in the Policies Map (Appendix 7), as well as a user-friendly interactive version of the Policies Map available online.</p> <p>The council has considered suggestions to adjust existing development boundaries. The final boundaries, as presented in the Policies Map (Appendix 7), reflect a balance between community feedback, technical evidence, and the strategic objectives of the Plan. Similarly, concerns relating to specific areas excluded from development boundaries have been carefully considered, ensuring that exclusions align with national policy and local needs.</p> <p>Whilst some respondents suggested using the term “built up area boundaries”, the council has opted for “development boundaries” for consistency with the NPPF and to avoid any potential for ambiguity. The Plan also reiterates that any future adjustments to development boundaries will be considered through the established Neighbourhood Planning process, empowering local communities to have a direct say in shaping the future of their areas.</p> <p>Policy PSD4 now also includes a provision to consider the potential for appropriate redevelopment of sites previously developed on a temporary basis. This addresses concerns about the potential loss of valuable land resources whilst ensuring any development is compatible with the surrounding environment.</p>
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21. I&O - Q21 Do you think the development boundaries should be reviewed? If so, through the Local Plan or through Neighbourhood Plans?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Of those that responded, 62% considered that development boundaries should be reviewed with most supporting this to be undertaken through the Neighbourhood Development Plans. • The boundaries are not currently clear, so review is welcomed. • Some supported maintaining the boundaries as they are. • For those that supported review through Neighbourhood Plans it was felt local people are better placed to draw appropriate boundaries. • For those that supported boundary review through the Local Plan, many suggested that boundary reviews had not taken place for some time and would align with new site allocations through the Local Plan. It was also said that reviewing boundaries through Neighbourhood plans could result in delays to the Local Plan. • Review of boundaries should be an open and transparent process subject to consultation. • Any boundary review should benefit local people not developers. 	<p>The council has carefully considered the feedback received regarding the review of development boundaries during the Issues and Strategic Options consultation. This input, along with technical evidence, has informed the council's approach to development boundaries in the Regulation 19 version of the Plan.</p> <p>Whilst some respondents supported maintaining the existing boundaries, the majority felt that a review was necessary, with most favouring Neighbourhood Development Plans as the primary mechanism for review. The council recognises the value of local knowledge and community involvement in shaping growth and development.</p> <p>As outlined in the supporting text to Policy PSD4 'Development Boundaries and the Open Countryside' [paragraph 5.28] the Plan supports Neighbourhood Plans in proposing adjustments to development boundaries. This approach empowers local communities to define boundaries that best reflect their specific needs and circumstances, whilst the Local Plan focuses on establishing a strategic framework for the borough.</p> <p>The Settlement Boundary Review (ED007) provided the technical basis for evaluating existing boundaries and adjusting the Strategic Centre, Urban Centre, and Rural Centres, ensuring they are consistent with the Plan's overall strategy. These adjustments are reflected in the final development boundaries presented in the Policies Map (Appendix 7) of the Plan.</p> <p>The Plan directly addresses concerns about the clarity of development boundaries. It provides detailed maps delineating the boundaries in</p>

	Appendix 7, as well as an interactive version of the Policies Map available online. This provides residents and developers with clear and accessible information, promoting transparency and understanding.
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22.I&O - Q22 What would you like to see on your local high street?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Key themes in the responses to this question were shopping, competition posed by sources such as online retail and out-of-town retail parks, parking, issues related to feeling safe and residential accommodation. • Of 87 responses to this question, 44 respondents used the word 'shop', a smaller proportion of responses used alternative words with similar meanings such as 'retail' and 'retailer' instead. 25 responses used the word 'market'. • Multiple respondents acknowledge changes in the average person's shopping habits, with shoppers preferring to spend their money either with online retailers, or at out-of-town retail parks, and that this is syphoning business away from the high street. The general consensus was that it is futile to challenge these rivals to high-street shopping directly but rather an alternative need to be presented by the high-street which online and out of town retail cannot provide. 14 respondents expressed the view that Newcastle-under-Lyme should return to its roots as a market town. • Respondents expressed that they would like to see a greater diversity of high street shops, a significant proportion stated a desire to see independent shops, specialist shops, and artisans; the word 'independent' or a misspelling of it appears some 26 times. • In contrast to this, some other respondents stated a desire for more well-known, high-end, high-class, upmarket, boutique, or quality shops and brands, the phrases used varied so it's harder to count these, but there were fewer people asking for this than those asking independent shops. • Several respondents note the difficulty posed in making up-market or independent high street shops sustainable, so that the 	<p>The Council has reviewed the position in respect of town centre / retail uses through the Retail and Leisure Study (2024). This study has considered the latest evidence re the performance of the retail centres in the Borough and used this evidence to define town centre / primary shopping areas. The Council has also reviewed the comments in drafting its retail approach set out in policy RET 1 (Retail) in the Local Plan. It is noted that some of the issues raised are outside of those matters that can be influenced by the Local Plan but have been considered by the Council as part of its wider operations.</p>

<p>people who live here can afford what is being sold, and the retailers themselves can afford rent. A reassessment of/ reduction in business rates was suggested, as was the offering of 'incentives'.</p> <ul style="list-style-type: none"> • The kinds of shops some respondents said they would like to see include, bars, restaurants and eateries, coffee shops, book shops, craft shops, convenience stores, post offices, doctors, and dentists. Out of 87 respondents, 12 said they would like to see more 'leisure.' • 'Charity shops', 'bargain shops', or 'pound shops' are mentioned 14 times, in all but 1 of these instances they were being described as a negative aspect of local high streets as they exist currently. • There are 11 separate respondents who were unhappy with and mentioned specifically the number of empty or derelict shops and premises. • More than once respondent suggests that other high streets such as Leek, Congleton, Nantwich, Sandbach, and 'towns in Cheshire' should be looked to as successes, and as examples of what to do with our own high street. • Of 87 responses, the word 'parking' is used in 12 responses. Of those 12, 3 respondents expressed wanting 'free parking. Some respondents felt that easier, and reduced or free parking would encourage shoppers to stay longer in the town. • Of 87 responses, 4 respondents desired an increase in 'police' or 'policing', 6 used the word 'safe', still others did not use these exact words but expressed concern for their safety in terms of homelessness and vagrancy, and of gatherings of teenagers with nothing to do and nowhere to go, and of anti-social behaviour. Still others expressed a simpler desire for the high street to be clean and tidy. • 11 respondents suggested that they would like to see more dwellings alongside or above high street shops. 	
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23. I&O - Q23 What should the Local Plan do to enhance the vitality & vibrancy of the Borough's retail centres?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> Many of the same themes appeared in this question as appeared in the previous one, question 22. In brief, most respondents stated that the plan should prioritise the viability of existing retail centres. Providing a healthier balance of retailers, and improvements to the appearance of existing shop fronts, by encouraging market stalls, and offering business rates that are attractive to independent retailers. Uses should be found for vacant units E.g., flea markets and pop-up shops. More dwellings should be provided around the in and around the town. Mix in housing with retail developments. More accommodation for the elderly/ retired close to town. Areas above shops should be converted into accommodation if viable. Neighbouring retail centres should be looked to for inspiration and support should be given to rural areas for their own retail growth. Transport and access to retail centres was a new key theme. Again, respondents expressed desire for cheaper/ easier or free parking which it was felt by several respondents would increase footfall. More should be done to encourage cycling and walking, creating cycle routes, improving public transport for example by having more evening buses. A respondent suggested the introduction of 'smart crossings' to manage traffic. Further pedestrianisation of the High Street, reducing speed limits in these areas, allowing for a café culture to develop/ outside eating in the summer. Linked to the matter of access to the retail centres, public safety was a recurring theme; respondents wanted the council to tackle the problems of homelessness/ vagrancy, and increase visible police presence in retail centres, as well as to provide convenient pedestrian access to and through the town for people who don't 	<p>The Council has reviewed the position in respect of town centre / retail uses through the Retail and Leisure Study (2024) and used this evidence to define town centre / primary shopping areas. The Council has also reviewed the comments in drafting its retail approach set out in policy RET 1 (Retail) in the Local Plan. It is noted that some of the issues raised are outside of those matters that can be influenced by the Local Plan but have been considered by the Council as part of its wider operations.</p>

<p>wish to use the underpasses or alleyways, or at least to make them safer.</p> <ul style="list-style-type: none"> • More events should be put on which will encourage people to come to the town centre, the Council should make sure that they are publicised so that people know about them. • Many suggestions touched upon the promotion of urban green spaces and open spaces; more should be done to maintain and enhance existing gardens, and consideration should be given to the creation of 'linear parks', creating and connecting smaller scale wildlife habitats to each other, green walls and roofs, wildflower areas, community growing spaces, more trees in streets. We should add more colour and greenery to the town. • One respondent suggested that incentives should be offered which attract skilled and green businesses to the area. That Newcastle could become known for eco-friendly/ carbon neutral business. 	
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24. I&O - Q24 Do you agree with the recommended changes to the town centre boundaries? If you don't agree, why?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none">• Of those that responded, just over half the respondents had no opinion on changes to town centre boundaries.• There were very few detailed comments on the boundaries overall.• Just over a quarter agreed with the changes.• A few mentioned that the community should be consulted and should agree.• More detail on the proposals and rationale were sought by some.• Some sought specific expansions: in Newcastle to expand the centre beyond the ring road and in Kidsgrove to incorporate the railway for regeneration purposes.• One noted there was an anomaly between the text in table 12 and the map of Newcastle boundary.	<p>The town centre boundaries have been reviewed in the light of comments made and the outcome of the updated Retail and Leisure Study ED010 (2024) and are delineated on the Policies Map.</p>

25. I&O - Q25 Is a Local Plan policy on air pollution required? If so, what should a policy on air pollution contain?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • A strong majority indicated a policy on air pollution is required for the Local Plan. • Walley's Quarry was a popular theme for this question. We should learn from the mistakes of Walley's Quarry and ensure future air quality issues are avoided from new and existing development. • The Local Plan and relevant policies are expected to address the impacts of air quality on people and the environment. • It is recommended to monitor air pollutants and particulates, ensuring they do not reach thresholds above national standards from existing and new development. • Growth in Audley was raised several times, with concerns of the cumulative impacts of housing and employment development on air quality. • It is observed that growth would lead to increasing vehicle usage, which in turn would result in increasing traffic, congestion and air pollution. These impacts should be avoided or mitigated as a result of development. 	<p>The council has carefully considered the feedback received regarding air quality during the Issues and Strategic Options consultation. The strong public support for a Local Plan policy on air pollution reinforced the council's commitment to addressing this important issue and promoting a healthy and sustainable environment. This commitment is reflected in Policy SE1 'Pollution and Air Quality', which sets out a comprehensive framework for managing air quality impacts and promoting a healthy and sustainable environment.</p> <p>The Plan acknowledges the concerns regarding Walley's Quarry. Policy SE1 emphasises the importance of considering the cumulative effects of emissions from proposed development alongside existing sources of air pollution. This includes requiring assessments for major development proposals to evaluate potential air quality impacts and implement effective mitigation strategies.</p> <p>Furthermore, the Strategic Transport Assessment (ED011) identifies a need for mitigation measures around several proposed developments due to increased traffic and congestion, directly supporting the air quality objectives of Policy SE1. The STA proposes several strategies to mitigate these impacts, which include:</p> <ul style="list-style-type: none"> • Enhanced Public Transport: For the proposed strategic development site AB2 (Junction 16 of the M6), the STA proposes enhanced bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme, and Crewe. This strategy aims to reduce reliance on private cars and, consequently, lower emissions. • Junction Improvements: The STA identifies a need for junction improvements at Talke (TK30) to mitigate congestion and

	<p>improve traffic flow. This will also have positive benefits in terms of reducing idling emissions and improving air quality in the area.</p> <ul style="list-style-type: none"> • New Link Road: The STA proposes a new link road connecting Keele Road and Whitmore Road to relieve pressure on the A525 and distribute trips more efficiently, directly reducing congestion and vehicle emissions on existing roads. <p>The council recognises the importance of monitoring air quality to ensure that the objectives of Policy SE1 are being met. The Air Quality Annual Status Report provides valuable data and analysis on air quality in the borough, highlighting existing Air Quality Management Areas (AQMAs) and key sources of pollution. This data, along with ongoing monitoring, will inform the implementation and review of Policy SE1, ensuring that air quality is protected and enhanced throughout the plan period, and that levels of air pollutants and particulates are monitored to ensure they remain within acceptable limits in accordance with national standards.</p> <p>This integrated approach, combining Plan policies with the Strategic Transport Assessment's focus on sustainable transportation solutions, demonstrates the council's commitment to addressing air quality comprehensively, promoting a healthy environment, and supporting the borough's contribution to reducing the impacts of climate change.</p>
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26. I&O - Q26 Is a Local Plan policy on water quality required? If so, what would it contain?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • A strong majority stipulated a policy on water quality is required for the Local Plan. • It is observed the Issues and Strategic Options Consultation Document provided little detail about water quality and relevant issues within the Borough. • It is recommended water quality should be monitored to ensure the highest possible standards, and it is not impacted by existing and future developments. • Walley's Quarry was mentioned several times with the suggestion of monitoring the effects of landfill sites on water quality. Again, we should learn from the mistakes from Walley's Quarry. • Growth in Audley is mentioned on numerous occasions with reference to the Water Cycle Study on page 55. It states Audley does not have the capacity at the treatment works the proposed growth in the Local Plan. • A policy on water quality should protect all existing waterbodies, watercourses and habitats, and ensure the control of discharge and wastewater from new and existing development. • The implementation of Sustainable Urban Drainage Systems (SUDs) should be strongly encouraged, and policies on Green Infrastructure should be adopted to reduce or prevent flood risk and water related impacts. • The Local Plan should address water quality and flood risk management in line with paragraphs 159-169 of the NPPF. • Up to date and relevant evidence should inform the Local Plan on water quality and flooding issues (e.g. River Basin Management Plans). 	<p>The council recognises the critical importance of protecting water quality and ensuring the long-term sustainability of water resources within the borough. This is reflected in Policy SE5 'Water Resources and Water Quality,' which has been developed in response to the overwhelming public support for a Local Plan policy on this issue.</p> <p>The council acknowledges that the Issues and Strategic Options consultation document provided limited detail about water quality. The Local Plan is supported by a robust evidence base, including an updated Water Cycle Study (ED014). This study provides a detailed assessment of the potential impacts of growth on water infrastructure and the water environment in Newcastle-under-Lyme. It considers constraints and requirements for water supply, wastewater collection, and wastewater treatment, allowing for a more informed and comprehensive approach to planning.</p> <p>Policy SE5 clearly articulates the council's commitment to "preventing pollution risks to groundwater, surface water, and associated ecosystems" and ensuring that "development does not compromise the existing ecological status of water bodies." The policy requires development proposals to consider nitrate neutrality and, where applicable, demonstrate that they will not increase nitrate levels in vulnerable zones or near sensitive water bodies.</p> <p>Policy SE5 also encourages the location of new development away from wastewater treatment works, in line with the NPPF and the agent of change principle, to mitigate potential risks. It also requires developers to work with the Environment Agency and water companies to implement appropriate mitigation measures where necessary, demonstrating a</p>

	<p>commitment to learning from past experiences and proactively addressing potential pollution sources.</p> <p>The council will appropriately monitor water quality throughout the plan period to ensure that the objectives of Policy SE5 are being met and that new development does not have a detrimental impact on the ecological status of the borough's waterbodies.</p> <p>The Water Cycle Study highlighted a potential capacity constraint at the Audley Wastewater Treatment Works due to the proposed growth in the Plan. This finding is directly addressed in Policy SE5, which requires all developments to consider the capacity limitations outlined in the study. It mandates that developers work with the Environment Agency and water companies to develop and implement appropriate mitigation measures where necessary, ensuring that growth does not overwhelm existing infrastructure.</p> <p>The Plan promotes a multi-faceted approach to protecting water quality. Policy SE4 'Sustainable Drainage Systems' strongly encourages the implementation of SuDS to manage surface water runoff sustainably, reduce flood risk, and enhance water quality. The benefits of SuDS are further emphasised in Policy SE14 'Green and Blue Infrastructure', which advocates for a network of these features to support a range of environmental objectives.</p> <p>The Plan's approach to water quality and flood risk management is fully consistent with paragraphs 159-169 of the NPPF, prioritising sustainable drainage, water efficiency, and the protection of water resources. The plan is also informed by up-to-date and relevant evidence, including River Basin Management Plans, ensuring consistency with regional and national best practices.</p>
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27.I&O - Q27 Is a Local Plan policy on environmental quality required? If so, what should a policy on environmental quality contain?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • A strong percentage stated a policy on environmental quality is required for the Local Plan. Development proposals should not pose a threat to environmental quality. • It is perceived that Green Belt release and development would compromise the quality of the environment within the rural areas. • Efforts must be made to prevent fly-tipping. • Environmental quality covers a broad spectrum of themes which was reflected in the responses. However, many comments were focused around the protection of the natural environment. • Policies in the Local Plan should ensure new and existing development does not negatively impact on habitats and species, biodiversity (including international, national and local designated sites for nature conservation), air quality, water quality and amenity. • Planning policies and decisions should protect and enhance the natural environment in accordance with paragraph 175 and 180a of the NPPF. • The Local Plan should set out an approach to deliver biodiversity net gains from developments. This includes transport proposals, housing and community infrastructure etc. • Policies should be in place to ensure the protection of irreplaceable habitats such as ancient woodlands, and ancient and veteran trees. • The Local Plan should safeguard soils and versatile agricultural land as they play a role in carbon storage and sequestration – climate change mitigation. 	<p>The council recognises the importance of protecting and enhancing environmental quality, reflecting strong public support for a Local Plan policy that addresses this broad and important issue. The Local Plan's approach to environmental protection is integrated throughout its policies, recognising the interconnectedness of environmental issues.</p> <p>The Plan acknowledges concerns regarding Green Belt release and the potential impact on the quality of the environment within rural areas. Policy PSD5 'Green Belt and Safeguarded Land' sets out criteria for any proposed Green Belt alterations, ensuring that the Green Belt's fundamental purposes are maintained, and that development is only permitted in the circumstances set out in national planning policy.</p> <p>Policy SE8 'Biodiversity and Geodiversity' directly addresses concerns regarding the protection of the natural environment. It requires all development to "ensure the conservation, enhancement, and restoration of biodiversity and geodiversity, avoiding adverse impacts" on a wide range of features, including international, national, and local designated sites, priority habitats, and ancient woodland. This policy aligns with the requirements of paragraph 175 of the NPPF, which calls for the protection and enhancement of priority habitats and ecological networks.</p> <p>SE8 also includes specific provisions for protecting irreplaceable habitats such as ancient woodlands and ancient and veteran trees. Additionally, the policy emphasises the importance of maintaining and enhancing ecological networks to support biodiversity. This is highlighted by the Nature Recovery Network Mapping Report (ED020), which identifies key</p>

	<p>areas for habitat connectivity and provides a framework for a more connected and resilient ecological network across the borough.</p> <p>The Plan takes a proactive approach to delivering biodiversity net gains from development. Policy SE7 'Biodiversity Net Gain' sets out the requirements for all new developments to achieve at least a 10% net gain in biodiversity, in line with the requirements of the Environment Act 2021. It outlines the biodiversity net gain hierarchy, prioritises on-site delivery, and encourages the integration of biodiversity net gain with the wider ecological network, promoting a holistic and strategic approach to enhancing biodiversity.</p> <p>Policy SE13 'Soil and Agricultural Land' addresses the need to safeguard soils and versatile agricultural land, recognising their role in carbon storage and sequestration, and their vital contribution to climate change mitigation. It promotes a hierarchy for developing land, prioritising the use of previously developed land and minimising the loss of best and most versatile agricultural land.</p> <p>The Plan addresses the issue of fly-tipping through Policy SE12 'Amenity,' which requires new development to be designed in a way that minimises opportunities for crime and antisocial behaviour. The council will continue to work with partner agencies to enforce existing regulations and address fly-tipping through appropriate enforcement measures.</p> <p>The Plan's approach to environmental protection is underpinned by a commitment to working with partner organisations, such as the Staffordshire Wildlife Trust, the Environment Agency, and Natural England, to ensure that development is sustainable, protects and enhances the natural environment, and contributes to the borough's overall environmental quality.</p>
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28. I&O - Q28 Do we need additional measures in the Local Plan to support national policies and guidance including the National Model Design Code on the design of development?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> Some confusion over what the National Model Design Code is and whether this was an appropriate discussion point. A fair level of support was received for the principle of design codes to provide certainty to the development industry about design quality but also to improve the sustainability credentials of development. Several sustainable construction standards were referenced and suggested that these should be required in new development such as BREEAM and Passivhaus. Support from Sport England for using Sport England Active Design principles and from the County Council for reflecting cycle infrastructure design transport notes. Some felt this was already clearly covered at a national level and that any change should be set through building regulations rather than the Local Plan. Suggestions that officers and members should receive additional training on design. Where appropriate, Neighbourhood Plans should feed into design codes. Public realm, Sustainable urban drainage, co-housing, affordable housing, renewable energy, adequate on and off-road parking and heritage were also frequently referenced themes. Mix of high-level design framework in the Local Plan and more detailed codes in the Neighbourhood Plan could be used. Beautiful design is subjective, who decides? 	<p>The council recognises the importance of high-quality design in creating attractive, sustainable, and functional places where people want to live, work, and visit. Policy PSD7 'Design' outlines the council's commitment to ensuring high-quality design in all new development. PSD7 aims to promote a design approach that is sensitive to local character and distinctiveness, creates beautiful and sustainable places, and fosters a sense of place and identity within the borough.</p> <p>The Plan acknowledges the public's interest in design codes and the desire for certainty regarding design quality. Policy PSD7 requires development proposals to accord with National Design Codes, National Design Guidance, and any adopted local design guides or codes. This ensures that new development meets nationally recognised standards whilst also reflecting the specific character and context of the borough. The council has carefully considered suggestions regarding sustainable construction standards.</p> <p>The Plan promotes sustainable development through various policies, including Policy CRE1 'Climate Change', which encourages the use of sustainable construction methods and materials to reduce embodied carbon. This policy also promotes the reuse of existing buildings and the use of locally sourced recycled materials.</p> <p>The council supports the use of Sport England's Active Design Principles, and Staffordshire County Council's Local Cycling and Walking Infrastructure Plans. These principles are reflected in Policy PSD6 'Health and Wellbeing', which promotes the creation of healthy and active communities, and Policy IN4 'Cycleways, Bridleways, and Public Rights of</p>

	<p>Way', which encourages the provision of safe and accessible cycling infrastructure.</p> <p>Whilst some respondents felt that design standards were adequately covered at the national level, the council recognises the value of providing clear and specific guidance at the local level. The Plan, therefore, sets out detailed design considerations, including height, scale, form, massing, materials, and the relationship to neighbouring properties and the wider neighbourhood. This ensures that new development is well-integrated with its surroundings and contributes positively to the overall character and quality of the built environment.</p> <p>The council is committed to ensuring that development in the borough is well-designed, accessible, and inclusive, reflecting the needs of a diverse population. Policy PSD7 explicitly requires that developments be accessible and inclusive, ensuring that they can be used safely, easily, and with dignity by all, regardless of disability, age, gender, ethnicity, or economic circumstances.</p> <p>The council recognises the value of Neighbourhood Plans in providing more localised design guidance. Policy SE9 'Historic Environment' encourages consideration of locally identified non-designated heritage assets and design policies outlined in adopted Neighbourhood Plans. This ensures that new development respects the unique character and heritage of local areas.</p> <p>The council will continue to work with stakeholders on design-related matters. The council will also consider developing supplementary planning documents (SPDs) or design codes to provide more detailed guidance on specific design aspects, such as green infrastructure, public realm design, and the integration of renewable and low-carbon technologies.</p>
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	<p>The council acknowledges that "beautiful design" can be subjective. The Plan, therefore, sets out a framework for evaluating design, emphasising a comprehensive and coordinated approach to design that considers various factors, including height, scale, form, massing, materials, green infrastructure, and the relationship to neighbouring properties and the wider neighbourhood. This ensures that new development is assessed against a consistent set of criteria, balancing the need for aesthetic quality with practicality, sustainability, and the needs of the community.</p>
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29. I&O - Q29 Do you agree that the Local Plan should set out identified areas for ecological recovery?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • The majority were in support of the Local Plan identifying areas for ecological recovery. • The Local Plan should aim to achieve 10% biodiversity net gain as stated within the Environment Act. Any approach should be in line with paragraph 73, 104, 120, 174, 175 and 180a of the NPPF. • Policies on ecological recovery should be informed by relevant evidence base work and should complement Nature Recovery Strategies at County level. • Observations were made that the local plan evidence on ecology and biodiversity needs to be updated. Current evidence includes the Biodiversity Opportunities Mapping Report produced in 2014. Engagement with statutory and non-statutory stakeholders is encouraged when updating evidence and identifying sites for ecological recovery. • Development plan policies should promote and encourage the use of the Biodiversity Metric 3.0 to calculate net gains and losses of biodiversity resulting from development. • A Habitats Bank and offsetting sites register should be established to enable developer compliance, and resources to be directed towards important areas for nature recovery. • Natural England and Chartered Institute of Ecology and Environmental Management provide good practice guidance for biodiversity net gain which could inform the Local Plan. • As well as ecological recovery, the Local Plan should identify opportunities for new multi-functional green and blue infrastructure, and recognise the functions and benefits they provide (i.e. climate change mitigation, reduce flood risk, physical and mental well-being, education, amenity etc). • It is perceived that all Green Belt sites are rich in biodiversity and should be protected. Development should not take place in the 	<p>The council acknowledges the strong public support for ecological recovery and recognises the need for the Local Plan to proactively address this important issue. Policy SE7 'Biodiversity Net Gain' and Policy SE8 'Biodiversity and Geodiversity' in the Local Plan demonstrate the council's commitment to protecting and enhancing biodiversity in Newcastle-under-Lyme.</p> <p>Many respondents expressed support for the Local Plan identifying areas for ecological recovery. This aligns with the council's approach, as embodied in Policy SE8, which requires all development to "ensure the conservation, enhancement, and restoration of biodiversity and geodiversity." SE8 protects a wide range of features, including international, national, and local designated sites, priority habitats, and ancient woodland. This approach aligns with the requirements of the NPPF, which calls for the protection and enhancement of priority habitats and ecological networks.</p> <p>The Local Plan seeks to achieve the 10% biodiversity net gain (BNG) mandated by the Environment Act 2021. This is reflected in Policy SE7, which requires all new developments to meet this requirement using Biodiversity Metric 4.0 (the most up-to-date version). This policy aligns with the principles outlined in the NPPF, demonstrating the council's commitment to national policy and best practices.</p> <p>The council recognises that the local evidence base on ecology and biodiversity, at the time of this consultation, was outdated. The new Nature Recovery Network Mapping Report (ED020), published in 2023, has informed Policy SE8, providing a more up-to-date and robust framework for protecting and enhancing biodiversity. This report identifies Habitat Connectivity Opportunity Areas, highlighting existing</p>

<p>Green Belt. The former Keele Golf Course site and Chorlton Moss were highlighted as examples.</p>	<p>good habitat connectivity and opportunities for future habitat creation or restoration to contribute to a more successful and connected ecological network.</p> <p>The Council will continue to engage with statutory and non-statutory stakeholders, including Natural England and the Staffordshire Wildlife Trust, during the development of the Local Nature Recovery Strategy to ensure complementarity and enhancement of local efforts.</p> <p>To facilitate developer compliance with BNG requirements and to direct resources towards important areas for nature recovery, the council will explore the creation of a Habitats Bank and offsetting sites register. This will provide flexibility for developers whilst ensuring that development contributes to a net gain in biodiversity. The council acknowledges that Natural England and the Chartered Institute of Ecology and Environmental Management provide good practice guidance for BNG. This guidance will be taken into consideration during any development of a Habitats Bank and offsetting sites register.</p> <p>In addition to ecological recovery, the Plan recognises the importance of multifunctional green and blue infrastructure (GI/BI). Policy SE14 'Green and Blue Infrastructure' promotes the incorporation of GI/BI into new developments, recognising their multiple benefits in mitigating climate change, reducing flood risk, enhancing physical and mental well-being, providing educational opportunities, and enhancing amenity. This approach aligns with the NPPF, which underscores the importance of green infrastructure in delivering a wide range of benefits.</p> <p>The Plan also recognises the value of Green Belt land in protecting biodiversity. Policy PSD5 'Green Belt and Safeguarded Land' aims to protect Green Belt land from inappropriate development. It allows for the release of Green Belt land only in the policy approach outlined. Specific concerns regarding the potential loss of biodiversity from</p>
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	development on sites like the former Keele Golf Course and Chorlton Moss will be carefully assessed during the planning application process, ensuring that the mitigation hierarchy is followed and that the requirements of policies SE7 and SE8 are met.
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30. I&O - Q30 Is a local policy on heritage required? If so, what should a local policy on heritage contain?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Respondents overwhelmingly stated that they would like to see a local policy on heritage, with 97.5% of respondents answering in the affirmative. Of the 2 respondents who answered 'no', they stated that they did not think it would be required if it was simply a duplication of national policies. While all of the 78 respondents who answered 'yes' felt a policy should be in place to preserve, enhance, and promote local heritage, thoughts, suggestions and priorities concerning how this should be done varied. • New developments should only be undertaken well away from places of historic interest. Designs should be sympathetic to the area and in keeping with other local buildings. Requirements that developments do not obstruct long-standing views. • Measures should be in place to protect heritage assets from theft or damage. Every heritage asset should have its heritage status reviewed and changed if needed, each should have a protection management plan to examine what is being retained, and what must be done to protect it. • Some felt that this should not be left in the hands of a lay person, and that skilled people with local knowledge should be making these assessments. An alternative approach was voiced by another respondent who felt that there is too much reliance placed on communities having the knowledge to designate heritage assets for the local list and more resources should be made available to help them do this. The importance of local knowledge was touched upon in many responses, with one respondent writing that this is a key reason why neighbourhood plans are so important, saying they should be used to inform local plans, because that community knowledge base it vital to recognising heritage significance. 	<p>The council recognises the significance of the borough's rich and diverse heritage and the public desire to protect and enhance existing heritage assets. In line with the overwhelming support for a local policy on heritage expressed during the <i>Issues and Strategic Options</i> consultation, the Local Plan has addressed this topic through Policy SE9 'Historic Environment.' SE9 establishes a comprehensive framework for conserving and enhancing the borough's heritage assets.</p> <p>The Plan acknowledges public concerns around the impact of new development on the historic environment. Policy SE9 directly addresses these concerns by requiring development proposals to "respond positively to local character and distinctiveness" and "conserve and, where possible, enhance the significance of all heritage assets and their settings."</p> <p>The policy emphasises a sensitive approach to design that considers the impact of development on listed buildings, scheduled monuments, registered parks and gardens, conservation areas, and the wider historic environment, including key views. This comprehensive approach aligns with the principles outlined in the Heritage Topic Paper (ED015), which highlights the need to protect not only individual heritage assets but also their settings, recognising that these elements contribute to the overall character and significance of the historic environment.</p> <p>Furthermore, Policy SE9 emphasises the importance of professional expertise in assessing potential impacts on heritage assets. It requires Heritage Impact Assessments (HIAs) for all proposals that could potentially impact designated or non-designated heritage assets. These assessments, informed by the Historic Environment Record and assessed</p>

<ul style="list-style-type: none"> • Among the responses we had, some took a broader view of heritage, they stressed that preserving heritage is not just about assets in the sense of buildings but can mean the protection of the countryside, lanes and footpaths. These are an important part of the borough's heritage and should be maintained at all times as part of any heritage policy. • Multiple respondents felt that special consideration should be given in the Local Plan to protecting the Borough's industrial heritage. 6 responses used the word 'mining', 4 used 'industry, 2 used 'mine.' 2 used 'industrial.' • Visitor centres, information boards, and monuments could be erected at sites of historic interest, work should be undertaken to offer tours to school parties and other groups, educational videos could be produced for online viewing, social media accounts dedicated to promoting local heritage could be set up. One respondent suggested that to further promote the history of the borough, consideration could be given to employing a small touring theatre group to visit schools and enact short plays about the history of the area. • Another respondent suggested that Apedale could still be further developed; we could build an outdoor activities centre and encourage much more use of the heritage centre to attract paying visitors. • Staffordshire County Council strongly advises that a local policy on heritage is required. It advises that an up-to-date historic environment evidence base is needed, the evidence base we have is not as robust as elsewhere. Our baseline understanding of the historic character and sensitivities of the borough is not where it needs to be, and that this is leaving us blind to the impact which medium to large scale development may be having. The County Council makes a number of detailed recommendations to remedy this in their representation. 	<p>as part of the planning process, help to ensure that any potential harm is identified and mitigated.</p> <p>The Plan also recognises the value of local knowledge in identifying and protecting heritage assets. Policy SE9 encourages consideration of local character assessments, heritage, and design policies, and any locally identified non-designated heritage assets, as outlined in adopted Neighbourhood Plans. This ensures that the unique character and heritage of local areas are respected, and that community knowledge is incorporated into the decision-making process, reflecting the importance of Neighbourhood Plans, as highlighted in the consultation feedback.</p> <p>The Plan also goes beyond the consideration of buildings and structures, it acknowledges the broader concept of heritage, which encompasses the protection of the wider historic landscape, including the borough's industrial heritage - a point emphasised by many respondents. Policy SE10 'Landscape' requires development proposals to be informed by the historic landscape character mapping provided by the Staffordshire Historic Landscape Characterisation Project and to identify and protect key historic landscape features and their settings. This ensures that the borough's rich and diverse landscape heritage is safeguarded.</p> <p>Whilst the Plan does not include specific provisions for visitor centres, information boards, and monuments at this time, the council will continue to explore these and other opportunities to promote the borough's history and heritage, in line with the feedback received. The council has worked with Staffordshire County Council and other stakeholders to ensure that the historic environment evidence base is kept up-to-date and robust, addressing the County Council's concerns about the need for a more comprehensive understanding of the borough's historic character and sensitivity.</p>
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31.I&O - Q31 What are your perspectives on the policy approach advocated in the 2019 Strategic Flood Risk Assessment?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • The majority of comments were focused around content and why a policy on flood risk is required in the Local Plan, rather than specifically referring to the SFRA 2019. They are as follows: <ul style="list-style-type: none"> ○ The natural environment is already at risk of flooding which impacts on habitats and species (biodiversity). ○ Policies on flood risk should ensure landowners better manage their land to prevent or reduce water run-off, whether it is a result of agriculture practices or new and existing development. Development will result in an increase of surface run-off. ○ A flood risk assessment should be required prior to any development. Upgrades to property and highway drains should be implemented to accommodate proposed growth. ○ There is a general assumption that developing in the Green Belt would result in increasing flood risks. ○ The local plan needs to acknowledge climate change, with the evidence indicating an increase in rainfall events, which in turn will increase flood risk. ○ The Local Plan should actively promote the use of Sustainable Urban Drainage Systems (SuDS), and areas of natural drainage should be preserved to reduce flood risk. 	<p>The council recognises the importance of managing flood risk and protecting the borough's communities and environment from the impacts of flooding. The Local Plan addresses the feedback received regarding flood risk, acknowledging the public's desire for a comprehensive and proactive approach to mitigating and adapting to flood risk.</p> <p>The 2019 Strategic Flood Risk Assessment has been updated in 2024 [ED013] which provides a detailed assessment of flood risk across the borough and identifies key areas of concern. In line with this, Policy SE3 requires a Flood Risk Assessment (FRA) for all development proposals meeting the criteria outlined within the policy.</p> <p>Policy SE3 'Flood Risk Management' requires development proposals to reduce flood risk through the application of the sequential approach and the exception test, considering all sources of flooding identified in the SFRA. This ensures that development is directed towards areas of lowest flood risk and that potential impacts on sensitive ecological areas are minimised.</p> <p>Policy SE3 also mandates FRAs for developments that meet specific criteria, including those in flood zones 2, 3, or 3b, as well as certain sites in Flood Zone 1. These FRAs must be informed by the latest SFRA, incorporate climate change allowances, and include a comprehensive assessment of flood risk from all sources, including fluvial, surface water, groundwater, and sewer flooding.</p> <p>The requirement for climate change allowances in the FRAs is a direct response to concerns about the increasing frequency of rainfall events and the potential for climate change to exacerbate flood risk in the</p>

	<p>future. This ensures that flood risk is thoroughly evaluated and that appropriate mitigation measures are incorporated into development proposals.</p> <p>The Plan promotes a multifaceted approach to flood risk management, recognising that effective mitigation requires both structural and non-structural measures. Policy SE4 'Sustainable Drainage Systems' actively encourages the implementation of SuDS to manage surface water runoff, which in turn helps to reduce flood risk.</p> <p>Policy SE14 'Green and Blue Infrastructure' further reinforces this approach by promoting a network of green infrastructure features to provide multiple benefits, including flood risk reduction, water quality improvement, and habitat creation.</p> <p>The Plan also addresses concerns regarding the potential for increased flood risk due to climate change. Policy SE3 requires that FRAs incorporate climate change allowances for peak river flows and rainfall, as well as groundwater assessments in susceptible areas. This ensures that new development is designed to be resilient to the projected impacts of climate change.</p> <p>The Plan acknowledges concerns about development in the Green Belt and the potential for increased flood risk. Policy PSD5 'Green Belt and Safeguarded Land' ensures that Green Belt land is only released for development in stated circumstances. This approach helps to protect the Green Belt's role in mitigating flood risk by preserving its openness and ability to absorb water.</p> <p>The Plan's approach to flood risk management is consistent with the NPPF, by promoting sustainable drainage, adopting the sequential approach, and promoting the utilisation of up-to-date flood risk assessments. The need for upgrades to property and highway drains to</p>
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	<p>accommodate proposed growth at Site Allocations has been considered as part of the borough's Infrastructure Delivery Plan, which outlines necessary infrastructure improvements. The plan is also informed by the latest evidence on flood risk and climate change impacts, ensuring that the council's approach aligns with national policy and best practices.</p>
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32. I&O - Q32 Do you agree that an open space policy should set out open space provision requirements in new developments?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • The majority were supportive of an open space policy establishing open space provision requirements from new developments. • It is suggested that the quantum of open space provision should be in accordance with national policy and relevant evidence base work such as the Open Space Strategy. • A Local Plan policy should make new and existing open space publicly accessible by foot and bike. This will encourage active lifestyles and offer travel alternatives to vehicles. It would promote sustainable modes of travel. • New open spaces, walkways and cycle paths should be created to increase accessibility and connectivity across the Borough. • The plan should recognise the benefits of open space provision. Open space provides health benefits both physically and mentally such as reducing obesity. Open space also provides environmental benefits such reducing flood risk and hosting wildlife. 	<p>The council recognises the importance of providing and protecting high-quality open spaces for the benefit of residents and the environment. This is reflected in Policy SE6 'Open Space, Sports and Leisure Provision', which has been developed in response to public support for a Local Plan policy that sets out clear requirements for open space in new developments.</p> <p>The Plan's approach to open space aligns with the feedback received during the <i>Issues and Strategic Options</i> consultation. It recognises the need for new and existing open space to be publicly accessible, the importance of creating new open spaces and connectivity routes, and the need for the plan to recognise the various benefits of open space provision.</p> <p>These principles are strongly emphasised in the Open Space and Green Infrastructure Strategy (ED022), which provides a framework for developing high-quality, accessible, and multifunctional green spaces to meet the needs of the borough. The Strategy specifically identifies the need for enhancing existing larger sub-regional open spaces and creating multifunctional local-scale open spaces and pocket parks, particularly in areas with higher levels of deprivation and where existing open space provision is limited.</p> <p>Policy SE6 requires major residential developments to provide a variety of open space types to meet the diverse needs of residents. These include allotments, amenity greenspace, natural and semi-natural greenspace, parks and gardens, and provision for children and teenagers.</p> <p>The amount of open space required is calculated based on the estimated population of any proposed development, ensuring that adequate</p>

	<p>provision is made to meet the needs of new residents. This approach is informed by the Open Space and Green Infrastructure Strategy (ED022), which provides a detailed assessment of existing open space provision and future needs, ensuring that the standards set out in the policy align with the borough's specific circumstances.</p> <p>Policy SE6 emphasises the importance of making new and existing open space publicly accessible. This includes a requirement for major development schemes to demonstrate how the management and maintenance of additional open space provision will be provided for and will be secured by condition/planning obligation. This ensures that open spaces are well-maintained and accessible to the community, encouraging active lifestyles and providing alternatives to vehicle use.</p> <p>The Plan promotes the creation of new open spaces, walkways, and cycle paths to increase accessibility and connectivity across the borough. This is supported by policy IN4 'Cycleways, Bridleways and Public Rights of Way' and SE14 'Green and Blue Infrastructure,' which encourage the provision of safe and accessible routes for walking and cycling, contributing to a more connected and sustainable network.</p> <p>The Plan recognises the wide range of benefits that open spaces provide, including health benefits (both physical and mental), environmental benefits (such as reducing flood risk and supporting biodiversity), and social benefits (such as promoting community cohesion and enhancing quality of life). These considerations are integrated into the site allocation process and are reflected in the site-specific policies for allocated sites.</p> <p>The council is committed to working with stakeholders, including local communities and relevant agencies, to ensure that open space provision is adequate, accessible, and well-maintained.</p>
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33. I&O - Q33 Is a Local Plan policy on transport required? If so, what should a policy on transport contain?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • Responses to this question answered overwhelmingly in the affirmative, with 96.34% of people saying 'yes'. • A key theme in 'yes' answers was that more should be done by the local authority to ensure to promote alternatives to driving in a private vehicle which uses fossil fuel, and that a policy on transport in the local plan could enshrine this, and any such policy should be linked closely with policies concerning the environment, e.g. green infrastructure, air quality, ecological networks, and supporting resident's access to nature. • Public transport should be cheaper and more reliable. There should be better co-ordination across the borough between bus, coach, and rail. More environmentally friendly public transport vehicles should be introduced for example electric or hybrid buses. It should be ensured that developments and expansions give greater consideration to walking, cycling, public transport and links to bus stops and stations, routes and service frequency. E.g. Any development north of Audley will need to include cycle/footway to Alsager station. • Developers should also give greater consideration to the safety and usability of existing roads which can be affected by new developments. • The network of walking and cycling routes across the Borough should expanded, existing routes should be consolidated and improved. One respondent suggested that whenever possible cycling infrastructure should be segregated from the highway to increase safety and uptake of active travel. • Respondents want the council to consider measures such as increased provision of electric vehicle charging points (EVCPs), at car parks and on all new developments (some adding the caveat; 	<p>The Final Draft Local Plan includes specific policies (namely IN2-IN4) that addresses specific aspects of transport & accessibility, allied to the promotion of active travel. Utilising travel plans & transport assessments to demonstrate that the safety, capacity and efficiency of the highway network will not be severely affected by development, and how the proposed development will link into and enhance existing or proposed walking, cycling or public transport infrastructure (e.g. bus services), is also advocated. Parking and the provision of car charging points are also factored in.</p> <p>The Strategic Transport Assessment (ED013) and relevant contemporary documents produced by Staffordshire County Council have as well been considered.</p>

<p>so long as they don't jeopardise the viability of the development).</p> <ul style="list-style-type: none"> • The County Council states their opinion that a policy on transport is required. The County Council considers walking, cycling and public transport as the key to sustainable transport and meeting the climate change declaration. The Staffordshire Local Transport Plan 2011 is outdated and does not reflect current policy. The policy will need to reflect Staffordshire's Local Cycling and Walking Infrastructure Plan (LCWIP) 2021 and Bus Service Improvement Plan 2021. The key evidence should include the Newcastle-under-Lyme Borough Integrated Transport Strategy. New development should be located and designed to limit journeys by car and should contribute to a step change in accessibility by active travel modes and public transport. The residual impact of traffic generation from new developments should be considered. Junction improvements, access roads and highway widening if deemed necessary should meet design standards. 	
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34. I&O - Q34 What measures would you like to see in a Local Plan policy on renewable energy?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • All consultees approved of a renewable energy policy for the Local Plan. • The 'fabric first' approach was referenced on several occasions which has implications for building design. New buildings should be designed maximising the performance of components and materials they are made up of, ensuring buildings are energy efficient and eco-friendly. • The installation of solar panels and sustainable heating systems (or pumps) should be a mandatory requirement for new build developments. • Employment allocations or proposed development, specifically in relation to industrial and warehousing should be in proximity to the rail network. This would offer sustainable modes of transport for the transfer of goods. • A design policy for new builds should establish design standards that go beyond the requirements of Building Regulations. • There was confusion with carbon zero targets. The Council / Local Plan has set a carbon zero target for the Borough by 2030. The Government has a set a carbon zero target for Britain by 2050. Is the Borough target realistic, and should it be more aligned with the Government's target? • There was also the view that the Local Plan should not deviate away from Government targets for reducing carbon emissions. Higher targets may affect the viability of development schemes. • Policies on renewable energy and climate change matters should be informed by the AECOM Climate Change Study. Several policy options and strategies from the evidence could be implemented through the Local Plan. 	<p>The council values the community's input on renewable energy and has carefully considered the feedback received during the Issues and Options consultation. The responses informed the development of Policy CRE2 'Renewable Energy' in the First Draft Local Plan, demonstrating the council's commitment to promoting sustainable development and a low-carbon future.</p> <ul style="list-style-type: none"> • Support for a Renewable Energy Policy: The overwhelming support for a renewable energy policy in the Local Plan reinforced the council's commitment to addressing climate change and promoting sustainable energy sources. Policy CRE2 'Renewable Energy' provides a framework for managing renewable energy development, ensuring that it contributes to the Borough's environmental and economic objectives. • "Fabric First" Approach: The feedback emphasising the "fabric first" approach to building design has been incorporated into Policy CRE1 'Climate Change'. This policy promotes sustainable construction methods and materials, maximising the performance of building components and ensuring that buildings are energy-efficient and eco-friendly. This integrated approach to sustainable building design helps to minimise energy consumption and reduce the Borough's carbon footprint. Furthermore, the policy explicitly requires that new developments achieve a high BREEAM rating and encourages the Building for a Healthy Life standard, supporting the feedback about incorporating sustainable building standards. • Solar Panels and Sustainable Heating: The feedback regarding the installation of solar panels and sustainable heating systems has been carefully considered. Policy CRE2 'Renewable Energy' encourages the use of on-site renewable energy generation,

	<p>including solar panels and sustainable heating, for all major developments as defined in the NPPF. The AECOM Climate Change Study's identification of 21,096 hectares as less constrained opportunity areas for solar development directly informed this aspect of the policy.</p> <ul style="list-style-type: none"> • Proximity of Employment Sites to Rail: The suggestion that employment sites, particularly those related to industrial and warehousing uses, should be located near the rail network has been incorporated into Policy IN2 'Transport and Accessibility'. This policy encourages the use of sustainable transport modes for the movement of both people and goods and prioritises locations with good access to public transport, including rail. • Design Standards Beyond Building Regulations: The feedback calling for design standards for new buildings that go beyond the minimum requirements of Building Regulations has been considered. Policy PSD7 'Design' promotes high-quality design and encourages the use of sustainable construction methods and materials. The Council will also consider developing supplementary planning documents or design codes to provide more detailed guidance on specific design aspects, as appropriate. • Carbon Zero Targets and Viability: The Council acknowledges the confusion regarding carbon zero targets and the difference between the Council's aspirational target of 2030 and the Government's legally binding target of 2050. The AECOM Climate Change Study highlighted the significant contribution of domestic buildings to the Borough's carbon footprint and the need for ambitious action to reduce energy consumption. While acknowledging viability concerns about more stringent targets, the Plan incorporates flexibility mechanisms, such as allowing for alternative solutions where on-site renewable energy generation is not feasible and considering viability assessments on a case-by-case basis. This approach aims to balance the need for ambitious
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	<p>carbon reduction goals with the practical realities of development.</p> <ul style="list-style-type: none"> • Informing Policy with Evidence: The Council confirms that the AECOM Climate Change Study has informed the development of policies on renewable energy and climate change. The study's findings and recommendations, including its assessment of the Borough's existing energy consumption patterns and the potential for various renewable energy technologies, have been carefully considered and are reflected in the Plan's approach to mitigating and adapting to climate change. <p>The Council is committed to promoting renewable energy and sustainable development and believes that the policies in the First Draft Local Plan reflect the feedback received and provide a strong framework for achieving the Borough's environmental and economic objectives.</p>
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35. I&O - Q35 Are there any other topics that the Local Plan should address?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> The environment and health were at the forefront of people's minds in answering this question. The word 'green' appeared in 13 out of 62 responses to this question, the word 'development' appeared 9 times. The majority of respondents who answered this question and who used these key words in their comments were against green belt loss/ release, though one respondent advocated a review of the existing green belt boundaries which they called out of date. Other comments expressed; that communities should be consulted on any developments in their areas, that the Local plan should give greater consideration to the climate emergency and the National Government's stated target of net zero by 2050, and that the Local Plan should give more consideration the impact which new developments have on local services and amenities like healthcare and schools. 2 respondents stated that the Local Plan should recognise the impacts which the HS2 project and the COVID-19 pandemic would have upon the Borough; as it relates to any housing site proposals, land charges, transport, environment, ecological recovery policies that may form part of the Local Plan. Related to COVID-19, the health of the Boroughs residents both in terms of mental and physical health and wellbeing was a key issue. 10 out of 62 responses to this question used the word 'health.' Within this context of the Local Plan promoting good health and wellbeing, respondents comments touched upon encouraging healthier lifestyles, safeguarding and improving open spaces and making sure residents have access to it, reducing pollution and introducing cleaner public transport, the creation of more cycle routes and footpaths for recreation and to enable active methods of commuting, developers needing to 	<p>The Council welcomes the public's input on a wide range of topics and has carefully considered the feedback received during the Issues and Options consultation. The responses have informed the development of policies and proposals in the Local Plan, demonstrating the council's commitment to a comprehensive and inclusive planning process.</p> <ul style="list-style-type: none"> Environment and Health: The feedback highlighting the importance of environmental protection and public health has shaped the Plan's approach to sustainable development. <ul style="list-style-type: none"> Green Belt Protection: The concerns about Green Belt loss/release are addressed through Policy PSD5 'Green Belt and Safeguarded Land' which safeguards the Green Belt from inappropriate development. The policy allows for limited Green Belt release only in exceptional circumstances, following a rigorous assessment process and prioritising brownfield development. Climate Change and Net Zero: The feedback emphasising the need for the Plan to give greater consideration to the climate emergency and the national net zero target by 2050 is reflected in Policies CRE1 'Climate Change' and CRE2 'Renewable Energy'. These policies promote sustainable construction methods, renewable energy generation, and a reduction in the Borough's carbon footprint. Impact on Local Services and Amenities: The concerns about the impact of new developments on local services and amenities, such as healthcare and schools, are addressed through the Infrastructure Delivery Plan (IDP) and the relevant service-specific policies. The IDP identifies the infrastructure required to support new

<p>consider the health and wellbeing of residents in their proposals, and making activities and resources available to communities, especially the elderly, after what may have amounted to years spent in isolation.</p> <ul style="list-style-type: none"> • Two respondents referenced Walley's Quarry stating that greater consideration should be given to waste and minerals in the Plan, and that thought should be given to the perceived negative health impacts which the site could cause those living nearby. • The suggestion that a Local Nature Recovery Strategy should be introduced, which would address concerns such as restoring degraded peatland, preventing large scale tree loss and replacing any lost trees, implementing root protection zones, and the creation and sequestering of habitats for carbon storage such as wetlands, woodlands, and diverse grasslands was made. • There were some comments which touched upon communication about the progress of the Local Plan to residents of the Borough, and that this needed to improve. A small number of complaints were voiced here about the website. Several respondents also took this opportunity to re-iterate their feelings about previous consultation points. 	<p>development and outlines a collaborative approach to its delivery. Policies PSD6 'Health and Wellbeing' and IN1 'Infrastructure' address the provision of healthcare and education facilities, respectively.</p> <ul style="list-style-type: none"> • Impact of HS2 and the COVID-19 Pandemic: The feedback regarding the need to recognise the impacts of HS2 and the COVID-19 pandemic on the Borough has been considered. <ul style="list-style-type: none"> ○ HS2: A large section of HS2 has now been cancelled. The Strategic Transport Assessment (STA) and the Transport sections of the IDP address the potential impacts of the local plan on the Borough's transport network, including any required mitigation measures. ○ Post-Pandemic Recovery and Local Needs: The Council acknowledges that the pandemic has had a significant impact on the Borough and that local needs may have changed as a result. The updated Housing and Economic Needs Assessment (2024) reflect the latest data and evidence, including the impacts of the pandemic, and inform the Plan's approach to meeting housing, employment, and recreational needs. • Health and Wellbeing: The feedback highlighting the importance of residents' mental and physical health and well-being has informed the Plan's approach to creating healthy and sustainable communities. Policy PSD6 'Health and Wellbeing' promotes healthy lifestyles, access to green space, reduced pollution, and improved public transport. • Waste and Minerals: The feedback regarding the need for greater consideration of waste and minerals in the Plan, specifically in relation to the environmental health issues at Walley's Quarry, has been considered. The Local Plan addresses waste management through Policy SE13 'Soil and Agricultural Land' and works with partner agencies to ensure appropriate
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	<p>waste disposal practices and to mitigate potential impacts on the environment and public health.</p> <ul style="list-style-type: none"> • Local Nature Recovery Strategy (LNRS): The Local Plan recognises the importance of the emerging Staffordshire Local Nature Recovery Strategy and will seek to ensure that the Plan's policies and proposals are consistent with the Strategy's objectives, where possible. • Communication and Consultation: The Council acknowledges the feedback regarding the need for improved communication about the Local Plan's progress and will continue to explore ways to enhance public engagement and make the plan-making process more transparent and accessible. The Council values public input and is committed to using consultation feedback to inform the development of the Plan. <p>The Council believes that the Final Draft Local Plan provides a comprehensive and balanced approach to addressing the key issues facing the Borough, including those raised in the Issues and Options consultation. The Plan is supported by a robust evidence base and reflects the Council's commitment to sustainable development that meets the needs of present and future generations.</p>
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36.I&O - Q36 Are there any other matters you would like to make a comment on?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> • There were a large number of individual letters which did not relate to any specific question but had general comments on the content of the plan. • Points raised included concern that the plan will have a negative impact on climate change, population and statistical issues, potential green belt loss, infrastructure issues. • In addition to the template letter which made a number of detailed points of concern including the potential for development in Audley Parish including at J16 of the M6, there were further unique letters that raised similar issues particularly in terms of infrastructure in Audley Parish, impact on the transport network, disagreement with the rationale for more housing or large scale employment sites, concern over impact on land holdings, agriculture, the countryside, wildlife and the environment • Some noted issues with the consultation such as that it was not transparent, not advertised well enough or that technical issues with consultation portal / objective made it difficult to submit comments. Some also suggested there were too many questions or that these were leading questions. • Some noted issues with the content of the document suggesting it was too long or language within the consultation document was difficult to understand and that the consultation period should have been extended to be able to read, digest, interpret and respond to the consultation material. 	<p>The Council appreciates the opportunity to hear from residents and stakeholders on a wide range of matters related to the future of the Borough. The feedback received on question 36 of the Issues and Options consultation, while not tied to specific questions, has been valuable in informing the development of the Local Plan.</p> <p>Addressing General Concerns: Many of the comments received expressed general concerns about the potential impacts of growth and development, including:</p> <ul style="list-style-type: none"> • Climate Change: The Council acknowledges the concerns that the Plan will have a negative impact on climate change. The Council has declared a climate emergency and is committed to addressing the challenges of climate change through a comprehensive and ambitious policy approach. Policies CRE1 'Climate Change' and CRE2 'Renewable Energy' promote sustainable construction, renewable energy generation, and a reduction in the Borough's carbon footprint. The Plan also emphasises sustainable transport and the protection and enhancement of green infrastructure to mitigate the impacts of climate change. • Population and Statistical Issues: The Council acknowledges that the 2021 Census showed a decrease in the Borough's population. However, the Housing and Economic Needs Assessment (2024) considers a range of factors, including long-term population projections, economic growth, and affordability constraints, to determine the Borough's future housing needs. The Plan's housing requirement is based on this robust evidence base, not solely on short-term population fluctuations.

	<ul style="list-style-type: none"> • Potential Green Belt Loss: The Council understands the concerns about potential Green Belt loss. The Plan emphasises the importance of protecting the Green Belt and only allows for its release in exceptional circumstances, which must be fully justified. Policy PSD5 'Green Belt and Safeguarded Land' sets out the criteria for Green Belt alterations, aligning with national policy and guidance. • Infrastructure Issues: The Council acknowledges the concerns about the capacity of existing infrastructure to support new development. The Infrastructure Delivery Plan (IDP) identifies the infrastructure required to support new development and outlines a collaborative approach to delivery, working with infrastructure providers and stakeholders to ensure that adequate capacity is provided in a timely manner. <p>Addressing Audley Parish Concerns: The Council understands the specific concerns raised about potential development in Audley Parish, including the impact on the transport network, the rationale for large-scale employment sites, and the potential effects on landholdings, agriculture, the countryside, wildlife, and the environment. These concerns have been carefully considered throughout the plan-making process, and the Plan includes a range of policies and proposals to address them. These include the designation of Audley as a Rural Centre (Policy PSD2), the criteria-based approach to development in the open countryside (Policy PSD4), the protection of the Green Belt (Policy PSD5), the promotion of sustainable transport (Policy IN2), the requirement for environmental impact assessments (Policy SE1), and the protection of biodiversity and geodiversity (Policy SE8).</p> <p>The Council believes that the Draft Local Plan represents a balanced and sustainable approach to meeting the Borough's development needs while protecting the environment and the interests of the community. The Plan is informed by a robust evidence base and reflects the Council's</p>
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	commitment to engaging with residents and stakeholders throughout the plan-making process.
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37.I&O - Q37 Do you have any files to upload?

Summary of Main Issues Raised	How the main issues have been taken into account
<ul style="list-style-type: none"> The majority of submissions to this question were more detailed and lengthy representations to the questions in the general consultation, often by organisations including statutory consultees or agents on behalf of landowners. Note: these have been summarised under the relevant questions. There were a few detailed submissions which promoted specific sites with development potential seeking allocation through the Local Plan. Some of the letters submitted as attachments addressed very similar to issues for those raised for question 36 including issues with the consultation and concern about potential development in Audley Parish. 	<p>The Council welcomes the submission of additional materials from residents and stakeholders, as this helps to ensure a comprehensive and inclusive planning process. The files uploaded in response to Question 37 of the Issues and Options consultation have been carefully reviewed and considered alongside other feedback received and the evidence base informing the Local Plan.</p> <p>The submissions included:</p> <ul style="list-style-type: none"> Detailed Representations: Many of the uploaded files provided more in-depth comments on specific questions in the consultation, offering valuable insights and perspectives that enriched the Council's understanding of local concerns. These detailed representations have been summarised and considered under the relevant questions in this report. Site Promotions: Several submissions promoted specific sites with development potential, seeking their allocation through the Local Plan. Sites submitted through the Council's Call for Sites process have undergone a thorough assessment using the site selection methodology. This methodology considers a range of factors, including location, infrastructure capacity, environmental impact, and community views. Additional Letters: Some of the uploaded letters addressed issues similar to those raised in Question 36, providing further context and reinforcing the Council's understanding of community concerns. <p>The Council values the input received through the uploaded files and has used this information to inform the development of the First Draft Local</p>

	Plan, ensuring that it reflects the needs and priorities of the community while promoting sustainable development.
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Annex 2: First Draft Local Plan

38. FDLP Consultation

Summary of Main Issues Raised	How the main issues have been taken into account
Consultation document is not written in a way that is accessible.	The process of undertaking the consultation on the Final Draft Local Plan is set out in the covering consultation report. The consultation has been undertaken in line with the council's Statement of Community Involvement ("SCI"). Copies of the consultation documentation were provided in Libraries / customer service centres and made available at the consultation 'drop in' events.
Consultation portal difficult to navigate	
Consultation should not have been conducted during summer break to allow as many resident concerns to be listened to as possible.	
Unable to download document	Responses to the Final Draft Local Plan consultation were accepted through the consultation portal but also via e-mail and in letter form. The consultation was held for an eight-week period between August and October 2024 to allow residents to engage appropriately with the process.
Given recent statements by the Secretary of State which suggests changes to the planning system. Many local authorities have put their local plans on hold. Why has NUL continued with their consultation process?	
The staff at the events had little knowledge, often directed consultees to the information boards or one member of staff.	
Staff did not make notes of people's comments at the consultation events	Comments made to the First Draft Local Plan had to be received in written form to count as a recognised comment to the consultation and this was made clear during the consultation process. The consultation webpages included a dedicated webpage on evidence-based documents. In respect of the growth directions, the sustainability appraisal notes that option 6 'hybrid approach' had been progressed as it represents a balanced approach that seeks to support sustainable patterns of development across the borough.
Although there were some councillors present there was no declaration of their attendance	
No mention of Neighbourhood plans in consultation process.	
Unclear how comments from this Issues and Options consultation have been taken into consideration for the Draft Plan consultation.	The Council also produced housing [ED031] and employment [ED032] plan strategy topic papers which set out the approach to the assessment of options in the development of the Plan.
Regulation18 notice had the incorrect consultation details	
Consultation not advertised	
The number of documents associated with the consultation is overly complicated and time consuming.	
Local Plan refers to multiple documents which are not linked from the report and are not always available on the evidence page	

<p>Audley Parish - We note that the consultation is taking place in the summer over the holiday season, which is not best practice. The document states that it is based on 'evidence documents, ongoing Duty-to-Cooperate discussions, and the responses to the Issues and Strategic Options document'. However, we could not find any summary or analysis of the outcomes of previous consultation or of how previous representations have informed the current document.</p>	
<p>Keele Parish - The previous "Issues and Options" consultation outlined 6 possible "growth directions" for the Borough, none of these are referred to in this draft of the local plan, so it is not clear how the previous consultation was used in developing the plan. This undermines the Issues and Options consultation and raises concerns about the consultation process in general. This plan should not only acknowledge the earlier consultation process, but also identify the "growth direction" chosen, and the reasons for its selection.</p>	

39. FDLP Introduction

Summary of Main Issues Raised	How the main issues have been taken into account
Local Plan will consider the need for new homes alongside the need for associated infrastructure	<p>The Local Plan sets the vision and framework for how the borough will grow up to 2040. The Plan sets targets for the number of jobs and homes to be delivered in the borough and a spatial strategy to guide development in the most sustainable locations. The Plan is supported by an Infrastructure Delivery Plan ED003, which considers the infrastructure implications of the Plan and the policies contained within it.</p> <p>The introduction section to the Final Draft Local Plan includes a section on Neighbourhood Plans in the borough and reflects the most up to date position at the time of publication. The introduction also provides background on the decision, in January 2021, to withdraw from the Joint Plan arrangements with Stoke-on-Trent City Council to prepare a single Local Plan for the Borough.</p>
The First Draft Plan repeats national guidance which could simply be referenced in the supporting paragraphs. This would ensure a more simplified, easier to read document.	
The Borough has been without a Local Plan for over a decade, and the decision to stop the preparation of a Joint Local Plan in January 2021 is not fully explained.	
The Inspector will only consider valid Regulation 19 stage representations at the Examination in Public, and previous representations will not be considered, although references may be made.	
The environmental health issue at Walley's Quarry needs to be resolved before any more houses are built.	
Keele and Silverdale parishes are also completing their Neighbourhood Plans.	

40. FDLP Context

Summary of Main Issues Raised	How the main issues have been taken into account
Active travel (such as walking to the shop or school) would be compromised with higher levels of car dependency resulting from development taking place in out-of-town locations (including Green Belt land) – physical inactivity & air pollution (with due regard to 3.5 & 3.9) would worsen consequently.	<p>The Final Draft Local Plan has been supported by a suite of evidence-based documents such as a site selection report which has sought to evidence decisions made in relation to the proposed allocation of sites in the Borough.</p> <p>The Local Plan is also supported by an Infrastructure Delivery Plan ED003, which considers the infrastructure implications of the Local Plan.</p> <p>The council has reviewed the context chapter to reflect updated data and updated figure 1 to revise the map of Cheshire East. The position outlined in Paragraph 3.21, in response to queries raised by Natural England, has been checked and notes how there are two Ramsar sites in the Borough at Betley Mere and Balterley Heath.</p>
The prevalence of excess weight & obesity in the Borough, when viewed alongside the healthy weight priority in the Staffordshire Joint Health and Wellbeing strategy 2022-2027, would indicate that leaving some open green space (with exercise areas) between developments would be beneficial for healthy activity.	
Cheshire East Council - The boundary of Cheshire East is shown incorrectly in Figure 1, which only shows the former boroughs of Congleton and Crewe & Nantwich without the former Macclesfield Borough	
The extent of development proposed at Audley / Bignall End and Red Street (plus other highlighted areas) brings into question how the educational needs of children moving into the area will be met. This is compounded by the lower levels of educational attainment in the Borough & difficulties in recruiting teachers.	
Given the lower levels of unemployment in the Borough, how can the destruction of natural habitats and wildlife be justified to develop warehousing, especially given the existing warehousing being developed in Tunstall	
Why there has been a lapse of time between local plans being implemented, allowing for private landowners to run amok with proposals for development on their land.	
Recognition is noted of the increased numbers of over 65's in the population & that this ought to affect many policy choices.	

The level of housing growth highlighted (as evidenced by the Housing & Economic Needs Assessment) & its alignment to the Standard Method would not support any increase in job creation.	
The 2021 census shows a decrease in population. Why is the need for housing so high & why are there not more high density, imaginative proposals for brownfield sites?	
Site specific comments to NC77: Loss of greenbelt, subsidence & mining legacies, flora & fauna impacts, recreational value, infrastructure including schools & healthcare services, traffic & road network repercussions as well as worsened air pollution.	
Interest rates & inflation could impact on the demand for housing. Lower salaries mean rental prices are currently unaffordable to many people.	
Site specific comments to NC13: The council is urged to review its targets for new housing in the Borough to reflect the actual need (both in number and type of dwellings). Reflecting on neighbourhood & Borough specific housing needs surveys undertaken allied to the constraints of the Green Belt (& it being developed only in exceptional circumstances). Reductions in population forecasts, the nature & character of the rural settlements, delivery rates of new homes over the last decade should all be factored in.	
Development would further limit the access to greenspaces, potentially increasing the health needs of the area.	
Natural England - paragraph 3.7 should be amended to reflect there being a single RAMSAR site in the Borough as well as the respective position re: SSSI status.	

41. FDLP Vision and Strategic Objectives

Summary of Main Issues Raised	How the main issues have been taken into account
Vision statement should be prepared for each settlement.	<p>The council has produced a borough wide vision supplemented by several strategic objectives. There are policies in the Local Plan, such as the Settlement Hierarchy (PSD2) which provides guidance at a settlement level. The vision refers to respecting and improving the character and distinctiveness of market towns, villages and other rural areas. Paragraph 4.2 refers to conserving and enhancing the historic environment.</p> <p>Reference to Kidsgrove is made in strategic objectives SO3-III and SO7-VII</p> <p>Reference to waterways in the borough has been added to Objective SO-9 (IX)</p> <p>Strategic Objective SO-3(III) has been amended to refer to creating safe vibrant centres.</p> <p>References to where possible have been removed from strategic objective SO 1(I).</p> <p>A reference to 'safe' has been added to objective SO-5 (V)</p> <p>Reference to 'where viable' has been removed from objective SO-4 (IV)</p>
Vision should reference the role the Borough should play in contributing to the growth of the region.	
The vision statement purely focuses on new homes and jobs as deliverables. The language in relation to other issues is weak. The vision statement should indicate how the Plan will positively affect the borough. The vision statement in Eden local plan is much more comprehensive.	
The vision / strategic objectives should refer to built heritage and culture.	
Support for the principles set out in paragraph 4.1 regarding brownfield land delivery.	
Support for emphasis on neighbourhood plans.	
More consultation is needed on the Local Plan vision.	
Several of the proposed allocations / proposed strategic locations contradict the vision and strategic objectives.	
Loss of Green Belt is not consistent with several of the strategic objectives.	
Natural England - note the support for a brownfield site first approach. Brownfield sites can have a high ecological value that should be considered through the Local Plan.	
National Highways – agree in principle to the vision and objectives of the draft Local Plan.	
Historic England – would welcome a specific reference to the historic environment and the need to protect and enhance the significance of the local historic environment.	
Environment Agency – SO-IV – support the objective to deliver significant reduction in carbon footprint. Regarding “Greener Construction”, what would be the criteria for deciding that the viability/deliverability tests are met?	

Staffordshire County Council – SOVII It is noted that there is a strategic objective specifically in relation to Kidsgrove. There does not appear to be a general objective around sustainable travel for other areas within Newcastle under Lyme.	
Waterways should be acknowledged as significant blue/green infrastructure. The waterway also forms part of the historic environment.	
Staffordshire & Stoke-on-Trent City Council Integrated Care Board - Whilst it is appreciated that the Local Plan is supported by an Infrastructure Delivery Plan, the desire to ensure that critical infrastructure elements are both resilient and adaptable could feature within the overarching objectives.	
Staffordshire Police – SO-III - It is recommended this be amended to 'which draw in visitors and create safe vibrant centres. Strategic Objective SO-V - It is recommended this is amended to 'and to provide aspirational housing, which is well designed, safe, secure and adaptable'. A sense of safety and security are integral to sustainable communities.	
Stoke-on-Trent City Council - supportive of the vision, strategic aims and objectives within the draft Plan and the moves to meet the Council's needs within its own boundaries and adding to the range of employment sites within the functional economic market area.	
How will Newcastle and Stoke work collaboratively, to maximise connectivity between North Staffordshire and the HS2 hub at Crewe? Collaborative working between the two local authorities will help to develop greater clarity around future development opportunities and help to attract more inward investment and jobs, into the region. The North Staffordshire conurbation is effectively one economic and social unit and would therefore benefit from the one single coordinated Local Plan.	
SO-I The final phrase "where possible" in relation to sustainable construction and sustainable transport should be deleted. Suggest that 'where possible' be replaced by 'unless demonstrably not possible'.	

SO-I - The Local Plan does not support objectives that support the special character of the local area.	
SO-II - concerned at the regional reference and the implied scale of development of 'growth for the region'.	
SO-III - Agree with reference to more town centre accommodation so that they become a vibrant centre.	
SO –III - The Ironmarket has a particular attractive layout but the whole town is degraded by several empty shops	
SO-IV - the final phrase after the word 'construction' should be deleted.	
SO-IV should be re-written, so that 'greener construction' is always required not just where it is 'viable and deliverable'. The plan should encourage aspiration to best practice construction standards and should include a requirement for maximising the use of recycled materials.	
SO-IV - The objectives show zero commitment to zero carbon	
SO-VI - should be re-worded as follows: [Note: text in brackets to be added] SO-VI Support the vitality of rural villages, preserving and enhancing the special character which is valuable to each local community whilst enabling balanced growth (through site allocations, infill development and the redevelopment of previously developed sites where available) to improve affordability and to provide choice in housing types for local people	
SO-V - do not know what is intended by 'aspirational housing'. If used in the final document, it should be clearly defined.	
SO-VII - concerned at the encouragement of (undefined) 'balanced growth'. This objective could be seen to encourage the development of new housing in and around all villages.	
SO-VIII - The local plan should reflect the outcomes of neighbourhood plans.	
SO-XII - This should stop after the words 'Green Belt'. Reference to exceptional circumstances in the objective should be removed as the Green Belt is protected by national legislation.	

Two additional Strategic Objectives should be added: - SO-X111 - That the vitality of industrial villages should be supported, including their special historic character. SO-X1V - That the outstanding regeneration of redundant housing and commercial building in industrial villages and other brownfields where previous industrial development creating contaminated land which has made development unviable without remediation in the district, should give priority over non-contaminated brownfields.	
A strategic objective should be added to refer to meeting the identified housing (including affordable housing) and employment requirements in the borough.	
The Plan should reflect the fact that it shares a functional economic area with Stoke-on-Trent City Council and therefore should be prepared using a joint approach	
Audley Parish - lack of mention of built heritage or of culture in general	

42. FDLP Approach to Policies

Summary of Main Issues Raised	How the main issues have been taken into account
Natural England - advise that it would be useful for the plan to include reference to the Guide to assessing development proposals on agricultural land. Soil is a vital resource for society, and policies should minimise disturbance and preserve ecosystem services during construction. These issues are interconnected with other policy areas like renewable energy, climate change, green infrastructure, biodiversity net gain, flood schemes, and development design. The Defra's Code of practice is recommended for sustainable soil use on construction sites.	<p>The Levelling Up and Regeneration Act received Royal Assent on the 26 October 2023. The Act introduces a new category of planning policies (National Development Management Policies). The National Development Management Policies require regulations to be brought into force before they are implemented. The council has and will continue to review the progress of the introduction of National Development Management Policies, alongside any other material considerations to Plan making. On the 19 December 2023, the government published a revised National Planning Policy Framework.</p> <p>The implications of changes made through the revised National Planning Policy Framework have been considered during the development of the Final Draft Local Plan. The Council is aware of further proposed changes to the National Planning Policy Framework (consulted on over the summer of 2024) and consider that the Local Plan can proceed in line with the transitional arrangements outlined in the draft version of the NPPF. It is also recognised that this is a draft of the NPPF and so may change in the final version. The Council will have due regard to the final version of the NPPF when it is published.</p> <p>The council has reviewed the need for any additional planning policies in the Plan in the light of consultation responses received and any new evidence or change in circumstances. The local plan is supported by an assessment which has considered the impact of planning policies on viability [ED004].</p> <p>The Final Draft Local Plan includes a suite of policies including parking standards, soil and agricultural land (SE14) alongside others.</p>
Staffordshire County Council - The plan should include a policy on parking and cycle standards to ensure safe parking levels within development sites, based on land use and local setting, to protect the highway network from safety issues.	
Support the council's decision to continue plan-making despite consultations and uncertainty. Note the council's intention to include more detailed development management policies, such as self and custom build, community facilities, and amenity, which adds to the plan-making process. The plan should extend the proposed plan period. Cost implications for community facilities and local amenities should also be considered.	
This indicates that the Local Plan focuses on strategic matters and detailed development management will be subject to later stages of the plan.	
Comments regarding the Levelling-Up and Regeneration Bill and potential impact on the Plan.	
Concerns about the impact of inflation on construction, viability and affordability.	
The plan should extend the opportunities for the specific designation of land for Self and Custom House Building (CSB) housing in the proposed area-based planning system, using Design Codes and following the recommendations of the Bacon Review 2012 (included in rep).	

Give the significant shift in demographic spread the council should include specific policies for provide for both small scale (Lifetime homes) and larger scale housing (Retirement village) solutions for older people.	
During the plan period, private and public sector finance may be tight and under threat, so land use planning and site allocation decisions should prioritise community gains as a clear part of the allocation process.	

43. FDLP Planning for Sustainable Development

Summary of Main Issues Raised	How the main issues have been taken into account
No mention in the Plan to Biodiversity Net Gain	<p>The First Draft Local Plan in draft policy SE5 ‘Biodiversity and Geodiversity’ references Biodiversity Net Gain. It is noted that since the consultation on the First Draft Plan, there has been some additional information released on Biodiversity Net Gain by Central Government including the confirmation of its legislative introduction in January 2024 for larger development sites and April 2024 for smaller sites. The final proposed policy approach is reflected in the Final Draft of the Local Plan.</p> <p>The Local Plan is supported by a suite of evidence-based documents including the consideration of infrastructure through the preparation of an Infrastructure Delivery Plan. The site selection methodology prepared by the council has considered the need to allocate sites across the borough to meet identified development requirements.</p>
Change town centre uses into housing proposals	
Welcome commitment to sustainable development which combats climate change and secures carbon reduction.	
Canals fall within the glossary definitions of open space and Green Infrastructure	
Developers should build out what they have permission for already before considering new sites for development.	
Services and facilities are oversubscribed.	
Concerns regarding the infrastructure implications of the Plan	
Objections to the loss of Green Belt and objections to several sites proposed in the Plan.	
United Utilities – need to consider proximity of sites to wastewater treatment works. Reference to agent of change considerations.	

44. FDLP Policy PSD1: Overall Development Strategy

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Cheshire East Council - it is not specified whether the requirement for one or more strategic employment sites is included in the minimum 69ha employment land or is in addition to it.</p> <p>It will be important for the boroughs housing and economic strategies to align.</p> <p>The implications of the strategic sites could be wide ranging, and there may be a need for further consideration of the alignment between the economic and housing strategies as well as wider commuting/travel to work patterns and transport implications.</p>	<p>The council's evidence for the approach set out in Policy PSD1: Overall Development Strategy is included in the Housing and Economic Needs Assessment (ED001). The Housing and Economic Needs Assessment has considered outputs from the 2021 Census.</p> <p>The Duty-to-Co-operate statement [ED025] sets out the position in relation to adjacent local authorities. For all of the neighbouring authorities, it is agreed that adjacent authorities are not able to accommodate any unmet needs and are not requesting that NUL accommodate any of their development needs.</p>
<p>Staffordshire Moorlands District Council - Newcastle Borough Council has previously asked if the District Council would be able to accommodate any of your housing requirement within our District and the Council responded saying this would not be feasible at this point in time.</p>	<p>On the 19 December 2023, the government published a revised National Planning Policy Framework. The implications of changes made through the revised National Planning Policy Framework has been taken into account during the development of the Final Draft Local Plan.</p> <p>The Final Draft Local Plan includes a housing trajectory in Appendix 6.</p>
<p>Stafford Borough Council - Stafford Borough Council is supportive of the vision, strategic objectives and planning for sustainable development. It is useful to provide a place-specific emphasis to provide more clarity associated with the approach for housing delivery and options for employment growth. Following this consultation period, as further evidence is prepared for the Newcastle under Lyme Local Plan, the Borough Council would value future engagement on details. Stafford Borough are unable to accommodate additional housing provision from your area.</p>	
<p>The council should review its targets for new housing in the Borough in the emerging Local Plan, to greater reflect the actual need (both in number and type of dwellings), recognising that the central Government formula only produces a notional starting figure. The review should take into consideration the most up to date population demographics from ONS (Office for National Statistics) (Office for National Statistics) (Office for National Statistics) and others, the various Housing Needs Surveys that have been undertaken throughout the Borough and the various</p>	

Neighbourhood Development Plans within the Borough, as well as accepting the planning constraints imposed by the Green Belt. We believe that the above approach acknowledges the exceptional circumstances that exist including: - falling population, Green Belt, housing supply and delivery, impact on the rural character of the borough and wildlife.	
Local Planning Authorities are required to use the Standard Method to calculate housing requirements in all but exceptional circumstances, contained at paragraph 61 of the National Planning Policy Framework 2021. This method has been criticised from several different quarters: The reduction in population and marginal increase in the numbers of households is exceptional and requires proper research and analysis. The most recent census figures, showing a decrease in the local population, are not being used (0.5% drop in population from 2011 – 2021). There is no justification for an increase in housing or use of the Green Belt.	
The Plan should update its Housing and Economic evidence	
Data on empty homes should be considered.	
The Plan should consider and recognise the role of Newcastle-under-Lyme as part of the wider joint housing and economic area with Stoke-on-Trent. Stoke-on-Trent City Council area includes more brownfield sites.	
Impact of the decision re HS2 on the overall numbers required.	
Concerns over the approach to housing land supply in the Plan. The Plan also needs additional housing evidence on supply including a housing trajectory	
As set out in the NPPF (National Planning Policy Framework) (para 69a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or demonstrate strong reasons for not achieving this target.	
The development strategy pursued by the council in previous years has consistently fallen below the Standard Method.	

There is no clear evidence to show how proposed student residential developments will not simply meet the future growth requirements of the University, or how the growth of the University will be met within the Plan Period (including whether this will have an impact on the take up of established residential properties for student use).	
The calculations should include / consider the contribution of windfall sites – not just as a buffer for non-delivery.	
A higher level of growth would support the baseline forecast of jobs growth, as identified by the Housing and Economic Needs Study and Experian (Turley, 2023), and deliver the labour force necessary to support any reasonable level of job growth. It would also allow flexibility to accommodate the identified needs of other authorities, as part of statutory requirements under its Duty-to-Cooperate.	
The ambition to make a success of the local economy, including the growth proposed through both the Keele Deal / Keele Growth Corridor and the Towns Fund will generate housing need above the minimum requirement established through the Standard Method which, combined with limited supply evidenced by past under-delivery, means that housing will continue to become difficult to access and may lead to the need to provide for more homes.	
The overall housing requirement needs to reflect on affordable housing needs in the Borough and whether the overall levels of housing development need to be increased to reflect this. The local affordable housing needs as established through the council's evidence base amounts to a net annual need of 278 affordable homes per annum. This equates to 77.65% of the overall annual housing requirement, which suggests that the overall housing requirement for the Borough may need to be higher.	
The policy does not make adequate provision for elderly residents through older persons accommodation.	

The strategy is unambitious and will neither support the needs of the population nor underpin accelerated job growth in the Borough. The strategy does not support even a baseline forecast of jobs growth, as identified by the Housing and Economic Needs Study and Experian or deliver the labour force necessary to support any reasonable level of job growth. There is a need to align jobs and housing.	
The plan should consider the allocation of 20% of the housing requirement for additional flexibility.	
The number of houses proposed in the Local Plan to be built on green sites in the Borough is disproportionately greater than the number proposed for non-green sites, and this therefore needs to be addressed.	
Plan covers period 2020-2040. We are already mid-2023. Plan due to be accepted end of 2024, so dwellings will have to be built over the remaining 15 years.	
The economic assessment should reflect a longer period (up to 2040) rather than being based on more short-term assessments.	
The draft local plan has no economic strategy. The overall vision refers to jobs but makes no mention of targets of the types of jobs	
The Local Plan also needs to ensure that development is proportionate to the area in which it is proposed	
There is an inadequate explanation of the reduction to 50 hectares for employment uses in criteria 2 of the policy (from 69 hectares) in this document and the evidence base.	
Employment site promoted at White Rock, Chesterton	
Question the justification for strategic employment site justified given the presence of nearby existing employment sites.	
Oppose the development of strategic employment sites in the Green Belt. None pass sustainability tests	
Object to the loss of Green Belt / Greenfield land.	
Brownfield sites should be the priority.	

No need for the larger scale strategic employment sites. No evidence of need for such provision in the Borough.	
If the council goes forward with formally allocating some or all the potential strategic employment sites that have been identified, then there will be a need for a commensurate uplift in the housing requirement to ensure that housing and employment growth is aligned.	
Criteria 4 of the policy needs to be redrafted to reference the role that other windfall development will have in meeting development needs	
Audley Parish - APC notes the growth proposals for housing and employment. It is less clear how this fits in to a wider strategy for regeneration of the wider conurbation. Whilst the Plan relates specifically to the Borough, it is necessary to take a wider view to ensure that regeneration occurs on brownfield site in the wider conurbation, rather than planning for the Borough in isolation, so relying more on greenbelt and greenfield development within the Borough.	
Silverdale Parish – disagree with distribution of development around Keele and Silverdale.	
Keele Parish - It has been suggested that the census fall might be due to 'statistical outliers and/or be the result of the census taking place at a time when students at Keele University were not present'. Whilst measures to control the pandemic may have impacted on the number of students in the area, they were required to complete the census for their term time address.	

45. FDLP Policy PSD2: Settlement Hierarchy

Summary of Main Issues Raised	How the main issues have been taken into account
Staffordshire County Council - Development proposals should maximise the use of existing resources and infrastructure to allow jobs, homes and other facilities to be located close to each other and be accessible by public transport. Enhancements to Active Travel corridors within the strategic centre and surrounding area should also be encouraged. Opportunities are set out within the Local Cycling and Walking Infrastructure Plan 2021-2031 (LCWIP).	<p>The settlement hierarchy in the Final Draft Local Plan was informed by several evidence base documents, including the Rural Area Topic Paper (2024) and the Sustainability Appraisal. The settlement hierarchy seeks to group settlements informed by levels of services and facilities etc. It should be made clear that the settlement hierarchy is different from the retail hierarchy which is used for the purposes of assessing the suitability or otherwise of retail development schemes. It is the retail hierarchy (policy RET1) that includes reference to Neighbourhood and District Centres. Areas such as Wolstanton, Porthill, Bradwell, Maybank, Chesterton, Silverdale. For the purposes of emerging policy PSD2, these centres would form part of the strategic centre of Newcastle-under-Lyme for the purposes of the Final Draft Local Plan.</p> <p>Keele Village (and University Hub) recognises the level of services and facilities in the village, informed by the rural topic paper [ED005]. The designation as a rural centre also reflects the point that Keele / Keele University is rural in character, being based in the open countryside / green belt and the presence of heritage assets including listed buildings and the Keele Hall Registered Park and Garden.</p>
The Draft Local Plan focuses on growth in the Strategic Centre, Urban Centre and Rural Centres. It does not seem to specifically acknowledge the importance of sustaining and growing the Neighbourhood and District Centres e.g. Wolstanton, Porthill, Bradwell, Maybank, Chesterton, Silverdale or any others referred to in Core Spatial Strategy ASP5. Silverdale and other industrial villages should not be confused with Newcastle under Lyme, which has its origins in the Royal Charter.	
The Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas.	
The hierarchy of centres plan is a granting of permission for development to take place even outside any planned or stated boundaries within Parish and Neighbourhood Plans.	
The role of changes in the bus service(s) should be reflected in the settlement hierarchy	
Support for NUL as a strategic centre	
The wording of policy PSD 2 could be amended to make it clear that residential use is supported in the Strategic Centre as set out by policy PSD3	
Support for the designation of Kidsgrove as an urban centre	
Under the urban centre category – it should be made clear that Kidsgrove incorporates Talke and Butt Lane.	

Support for Rural Centres to meet some of the development need within the Borough	
Audley Neighbourhood Plan makes provision for proportionate growth	
The designation of Audley as a rural centre is in direct conflict with strategic location AB2.	
Audley is a ward with a very high level of Green Belt, and this designates its character. It is also composed of many distinct villages that are currently discreet. Any further development will destroy these characteristics and be detrimental to the health and well-being of its parishioners.	
Miles Green should be regarded along with Audley and Bignall End as part of the identified Rural Centre under Policy PSD 2	
Betley & Wrinehill are defined in the Local Plan as a Rural Centre this designation raises concerns as some of the facilities and infrastructure within the Parish are at or close to capacity and there is no scope to expand them.	
The composition uses and economic weight of the University, alongside Keele, create a settlement that is geographically, economically and functionally different from other Rural Centres in the settlement hierarchy.	
Keele Village (and University Hub) has been designated as a Rural Centre. Whilst we are pleased that this could result in protection of the rural and historic character, the village itself contains little in the way of facilities beyond the primary school and pub, all the other necessary facilities for a rural centre being based on the university campus. Outside of university term time this would inevitably result in a reduction of the facilities available, and for elderly residents' facilities available on the university campus are not easily accessible, often requiring a vehicular journey.	
Keele and Keele University can accommodate a greater level of housing growth which will catalyse regional economic growth	
Keele Parish - We note that although no discussions have taken place with Keele Parish Council, Keele Village (and University Hub) has been designated as a Rural Centre.	

In relation to 'Other Settlements and Rural Areas' the Spatial Strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one village	
What is the justification for the scale of development in rural settlements?	
Betley Balterley & Wrinnehill Parish Council - as a Rural Centre this designation raises concerns as some of the facilities within the Parish	

46. FDLP Policy PSD3: Distribution of Development

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Natural England - Development in Betley & Wrinehill will need to ensure that foul and surface water does not impact on the Midland Meres & Mosses - Phase 1/ Betley Mere SSSI (Site of Special Scientific Interest) Loggerheads is close to Burnt Wood SSSI and several areas priority habitat. Any sites coming forward in this area should follow the mitigation hierarchy in line with Policy SE5: Biodiversity and Geodiversity.</p>	<p>The Local Plan reflects work in testing and refining several spatial options. The distribution of planned growth set out in the Final Draft Local Plan (in Policy PSD3) is the preferred spatial option. The approach to considering spatial options is set out in the Housing and Employment Plan Strategy Topic Papers [ED031 / ED032].</p> <p>Policy PSD3 presents figures which are intended as a guide and are neither a ceiling nor a specific target. It is designed to facilitate the broad distribution of growth across the borough to meet the housing requirement identified in the Plan, alongside an acknowledgement of existing commitments and completions in the Plan area.</p>
<p>Historic England - When considering the most appropriate locations for development we urge you to consider how the historic environment may be impacted by the location of proposals. The SEA (Strategic Environmental Assessment) process ensures that reasonable alternative sites are considered so that the harm to heritage can be avoided / minimised.</p>	
<p>Maer and Aston Parish Council - Maer and Aston Parish Council disagrees with the target figure of 500 additional homes for the Loggerheads rural centre</p>	
<p>Policy wording should refer to a minimum rather than 'in the order of'</p>	
<p>Betley Balterley & Wrinehill Parish Council - as a Rural Centre this designation raises concerns as some of the facilities within the Parish</p>	
<p>Propose that the wording should be changed from '...in the order of...' to '...no more than....'</p>	
<p>The Borough approach ignores the reality that the housing market is wider than the borough boundaries.</p>	
<p>Support for the largest proportion of identified need being directed to Newcastle-under-Lyme, in line with its role as the Strategic Centre at the top of the settlement hierarchy.</p>	
<p>Silverdale – concerns over the density of development and associated implications.</p>	
<p>Silverdale – local infrastructure cannot sustain the amount of development proposed. The size of the new community is beyond the capacity of Silverdale to integrate the emerging communities</p>	

Scale of development directed to Keele / Silverdale is a concern.	
Silverdale - It could be argued that this section is misleading as it suggests that the bulk of the new homes (4,800) will be in the strategic centre of Newcastle, which would support the vision of brownfield development and urban development of the town centre. However, it can only be assumed that this number includes 1,214 houses planned within the parish of Silverdale, as it is no longer designated as a separate district centre.	
Only 900 homes are proposed for urban centre (Kidsgrove), which is too low based on the evidence. Policy PSD2 recognises that Kidsgrove benefits from services and facilities and Kidsgrove railway station	
The policy wording should clarify that Talke forms part of Kidsgrove for the purposes of this policy. Concern over the level of development proposed for Talke / Kidsgrove.	
It does not appear that the approach advocated by Policy PSD 2 has been followed through in Policy PSD 3 in respect of distributing development to Rural Centres in an evidence-based way	
The Borough Council should look again at the impact that new homes would have on the rural centres listed in the document (infrastructure, local countryside and wildlife).	
Any uplift in housing should be directed to the rural centres.	
Audley – level of development proposed does not preserve the rural nature of villages. Concerns over impact on local highways and infrastructure.	
The proposed site allocations, when considered alongside commitments and completions exceed the number proposed in the spatial distribution policy for Audley.	
Audley – several site promoters support the level of development proposed Audley and the figure could be uplifted further.	

Madeley – concerns over the existing infrastructure the village have and any ability to accommodate any further development.	
It is unclear how the 200-home guide requirement was determined as being the appropriate amount of development for Madeley & Madeley Heath (in addition to Betley & Wrinehill). There is no assessment of local needs across the different rural centres, nor might an assessment of what quantum of housing be appropriate in each taking account of constraints and both existing infrastructure provision and future needs.	
Madeley – site promoters are of the view that Madeley and Madeley Heath have the infrastructure required to be a greater focus for new development.	
Loggerheads – concern over the level of infrastructure. The 500 allocated to Loggerheads is too much. Recent expansion of the village has placed a strain on local infrastructure. Concerns over the accessibility to services and facilities in Loggerheads.	
Loggerheads is being asked to provide a disproportionate number of dwellings compared to nearby villages such as Audley and Madeley. This will lead to the urbanisation of the village.	
Loggerheads – site promoters have indicated that in their view Loggerheads is an appropriate area for growth.	
The policy mentions proposals to accommodate development at Keele and Keele University. Keele University has called for better quality homes to be built in the area, which will encourage staff to be based in the local area, reducing the numbers commuting from across the region and beyond.	
The growth of Newcastle-under-Lyme and Keele are complimentary to each other, and this growth is supported as part of the overall distribution of development.	
The identification of Baldwins Gate as a Rural Centre is supported. However, it remains unclear as to why this has not translated to apportionment of homes, unlike other equivalent or less well served Rural Centres which have been apportioned homes within Policy PSD 3.	

The councils Viability Assessment shows that the south of the Borough is more likely to be able to accommodate viable development which includes affordable housing. In addition to this, it is not constrained by Green Belt.	
Baldwins Gate is an area that needs an improvement in infrastructure including bus services.	
The appeal decision at Baldwins Gate for 200 dwellings needs to be reflected in the Plan	
Support for new housing for key workers in the local rural economy Should PSD 3 include an allowance for other rural areas under an additional clause (e)? This should not allow such settlements to atrophy by policies that do not allow any new development. There can be proposals that because of their type and make up will improve the overall sustainability of settlements.	
Keele Parish - It could be argued that this section is rather misleading as it suggests that the bulk of the new homes (4,800) will be in the strategic centre of Newcastle, which would support the vision of brownfield development and urban development of the town centre.	
Recognise that Keele University has called for better quality homes to be built in the area, which will encourage staff to be based in the local area, reducing the numbers commuting from across the region and beyond. Appreciate that this would require some Greenbelt release which is supported subject to requirement that 30% is affordable housing	
Loggerheads Parish Council proposes that instead of the 142 dwellings that the abovementioned sites amount to, Loggerheads Parish will consent to 49 dwellings based on infill of 7 dwellings per year, over the next 7 years. Proposes the wording of ' <i>...in the order of...</i> ' is changed to ' <i>...no more than....</i> '.	
CPRE Staffordshire - We question the justification for the scale of development proposed for allocation in the Rural Settlements.	

47. FDLP Policy PSD4: Development Boundaries and the Open Countryside

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Historic England - it should be clear that appropriate development is required which protects the significance of heritage assets, including their setting. It may be worth including some additional information about how to deal with development affecting heritage assets within the open countryside, as well as issues relating to historic farmsteads and how to safeguard these assets. It may be worth including some additional information about how to deal with development affecting heritage assets within the open countryside, as well as issues relating to historic farmsteads and how to safeguard these assets.</p>	<p>The council has reviewed and identified existing development boundaries for the Strategic Centre, Urban Centre and Rural Centres in the Plan. The Green Belt boundaries have been considered where there is an allocated site, however, exceptional circumstances in the Council's view extend to amending Green Belt boundaries to support Plan allocations only but does not extend to Green Belt boundaries for other reasons, such as boundary changes.</p>
<p>Staffordshire County Council – reference should be made to policy IN2 Transport and Accessibility in criteria 4 of PSD4. Para 6.24 - reference should be made to a Town Centre Car Park Rationalisation Strategy to demonstrate no longer a local need.</p>	
<p>The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would therefore not accord with the positive approach to growth required by the Framework. The policy wording as currently drafted only allows for development in a narrow set of circumstances (i.e. replacing existing dwellings, previously developed land, re-use of existing rural buildings etc.) and does not allow for sufficient flexibility to respond to changes of circumstance such as a shortfall in the Councils five-year housing supply position.</p>	
<p>Policy should be reframed to avoid the use of footnotes in the policy.</p>	
<p>Concerned that settlement boundaries can so easily be changed.</p>	
<p>Representations received to change development boundary in various locations</p>	
<p>Representations received to amend village envelope boundary at various locations</p>	
<p>Settlement boundaries should be drawn around proposed allocations and sites that have come forward on countryside location sites in recent years.</p>	

It is essential that this policy is applied to any proposed allocations in the Local Plan	
Support for the Betley and Wrinehill (joint) development boundary in principle.	
Policy is too vague	
Link of policy to the policies map should be made clearer. Policy map is not clear enough	
Danger that the policy approach being more restrictive than Green Belt policy (limited infilling within villages)	
Not clear whether allocated sites in the Local Plan outside development or settlement boundaries will be restricted. Additional clarity on the approach should be added to the supporting text.	
The council policy officer's ought to discuss rural policy formulation with their development management team to understand the existing and growing scope and extent of permitted development and prior approval regimes for many rural building and especially agricultural ones (Class Q conversions of barns to dwellings) to promote limited and organic new development in the countryside	
No assessment of small plots and infill sites – for example in Keele.	
Criteria 4 - Self-build should be encouraged as part of allocated sites rather than a policy approach	
Criteria 4b – need to ensure that existing employment sites in the Green Belt can expand.	
Re-building rural buildings (4e) - unclear what 'rebuilding' entails 4f might have the same effect re new for old.	
Criteria 4 (h) on affordable housing / self-build should only apply on land adjacent to an identified settlement rather than in the 'open countryside'	
Criteria 4(h) will help ensure that rural housing needs are met, and rural communities remain sustainable	
Criteria 4 – need to ensure alignment between policy criteria 4 (H) and policy HOU 1.	
Criteria 6 – Importance of agricultural land for crops, animals and food.	

Criteria 6 - recognition should be given that on allocated sites considerations related to agricultural land quality will not apply.	
Para 6.24 - asset rationalisation process will there be the opportunity to consider alternative proposals in addition to windfall housing options and how might infrastructure providers best engage in this process?	
Para 6.25 - more information required as to brownfield sites which have been looked at.	
Staffordshire and Stoke integrated care board - In respect of the car parking provision and asset rationalisation process will there be the opportunity to consider alternative proposals in addition to windfall housing options and how might infrastructure providers best engage in this process?	
Audley Parish Council - We are not sure from the map in the draft Policies Booklet whether the settlement boundaries For Audley and Bignall End have been amended to include the proposed site allocations or whether the site allocations are outside of the boundary.	
Loggerheads Parish Council - is concerned that defined boundaries, which were given effect in 2019 but backdated to 2013, can so easily be changed to accommodate what is the suspected approval of planning application 23/00002/OUT for up to 200 dwellings at Mucklestone Wood Lane.	
CPRE Staffordshire - Is too vague, A clear definition is important here, we think that you are going well beyond national or accepted policy here. There seems to be a direct conflict between Policy HOU1 and PSD4 which needs to be resolved between their respective authors. We think that PSD4 is seriously flawed	

48. FDLP Policy PSD5: Green Belt and Safeguarded Land

Summary of Main Issues Raised	How the main issues have been taken into account
Representations from the development industry in support of the Keele Inset boundary	<p>The Council understands the importance of the Green Belt in protecting the countryside, preventing urban sprawl, and preserving the setting of settlements. The feedback received on Policy PSD5 'Green Belt and Safeguarded Land' during the Regulation 18 consultation has been carefully considered, and the Regulation 19 Local Plan reflects the Council's commitment to safeguarding the Green Belt while accommodating necessary development in a sustainable manner.</p> <p>Balancing Green Belt Protection with Development Needs:</p> <p>The Council acknowledges the diverse views expressed regarding Green Belt policy, ranging from strong support for its protection to calls for its release to accommodate development. Whilst recognising the value of Green Belt land, the Plan also acknowledges the need to meet the Borough's housing and employment requirements and to provide for essential infrastructure.</p> <ul style="list-style-type: none"> • Exceptional Circumstances: The Plan demonstrates exceptional circumstances to justify the limited and strategic release of Green Belt land for development. This is supported by a robust evidence base, including the Housing and Economic Needs Assessment ED001 (2024), which demonstrates a quantifiable need for housing and employment land that cannot be met entirely on suitable alternative sites within the existing settlement boundaries. The Green Belt Assessment ED008 (Parts 1, 2, 3, and 4) and Site Selection Report ED029 provides further justification for the proposed Green Belt alterations, considering the five purposes of the Green Belt and the potential impact of development on the openness and character of the Green Belt. • Keele Inset Boundary: The Plan establishes an inset boundary at Keele. This decision is supported by the Green Belt Village Study ED009, which assessed Keele against the relevant NPPF's criteria.
Disagree with Keele inset boundary and the basis of the assessment. No local consultation.	
All villages washed over in the Green Belt within the borough should be examined as per Keele.	
Representations from the development industry advancing the inclusion of additional sites to the Plan and amendments to the Green Belt boundary	
The case for exceptional circumstances has not been proven	
Disagree with Green Belt allocations in the Local Plan	
The case for exceptional circumstances has been proven - The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.	
Reduction of Green Belt land is not acceptable. Maintenance of Green Belt land is strongly supported.	
Insufficient Green Belt land is being included as an allocation in the Plan	
Support from the development industry for safeguarding land to respond to future demand. National policy is clear on the need to ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2040).	
Need further reassurance that safeguarded land (if required) is land not allocated for development at the present time.	
Need to ensure alignment between policies PSD 4 and PSD 5.	
Rather than compensation, Green Belt should not be developed on	

Criteria 4 of Policy PSD 5 could be amended as follows: 4. The construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is one for the exceptions listed within national planning policy or for Rural Exception Sites (but excluding Entry Level/First Homes Exceptions Sites) in accordance with Policy HOU 1.	<ul style="list-style-type: none"> • Compensatory Improvements: The Plan requires compensatory improvements to offset the impacts of Green Belt release, ensuring that the overall quality and accessibility of the Green Belt are maintained or enhanced. These improvements may include enhancing environmental quality, restoring degraded landscapes, creating new habitats for biodiversity, and providing new or improved walking and cycling access within the Green Belt. <p>Alignment with Other Policies:</p> <ul style="list-style-type: none"> • Alignment with PSD4: The Plan ensures alignment between Policy PSD5 (Green Belt) and Policy PSD4 (Development Boundaries and the Open Countryside), providing a coordinated framework for managing development both within and outside of settlement boundaries. <p>Addressing Further Concerns:</p> <ul style="list-style-type: none"> • Brownfield First Approach: The Plan prioritizes the redevelopment of brownfield land and the reuse of existing buildings, seeking to minimise the need for Green Belt release. This is reflected in Policy PSD1 (Overall Development Strategy) and Policy PSD4 (Development Boundaries and the Open Countryside). • Review of Washed-Over Villages: The Plan has considered the feedback regarding the review of villages currently "washed over" by the Green Belt. The Green Belt Village Study (ED009) assessed villages within the Green Belt and concluded that Keele should be inset from the Green Belt, while Whitmore should remain washed over by the Green Belt. • Specific Site Allocations: The Council has carefully considered the representations received regarding individual site allocations within or adjacent to the Green Belt, such as SP11, SP12, SP23, TB19, and those sites put forward by CPRE Staffordshire. The final site allocations reflect a balanced approach, informed by the need for housing and employment land, infrastructure capacity,
No consideration has been given to removing other tight knit village envelopes out of the Green Belt that would maximise the use of previously developed brownfield sites currently viable for development and enclosed within a village boundary so no expansion would be incurred, but due to the villages being washed over in Green Belt they are excluded from this plan.	
United Utilities - UUW requests the support of the council for future investment in infrastructure to be able to expediently respond to the infrastructure needs	
You will need to ensure that your Strategic Flood Risk Assessment identifies any sites that are in a location that is at risk of flooding from a reservoir and ensure that this is considered in your site-specific comments within Chapter 15. UUW can provide this in future	
Betley Balterley & Wrinehill - the Parish Council urges the Borough council to take measures to protect the wider Green Belt across the Borough.	
CPRE Staffordshire - We regret that you have not indicated the settlements for which you intend to prepare boundaries in the Regulation 19 document - and have found no reason for this omission.	
Keele Parish - Statements within this policy appear contradictory as we cannot see how 2a (removal of the Golf Course from the Green Belt) can co-exist with statements 3,4,5 & 6. We strongly object to the removal of Keele Golf course from the Green Belt (SP11 & SP12) and will comment	

on this later in the response under site allocations, along with SP23 and TB19.	the five purposes of the Green Belt, and the need to protect the environment.
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49. FDLP Policy PSD6: Health and Wellbeing

Summary of Main Issues Raised	How the main issues have been taken into account
Sport England - For all developments, apply Active Design Guidance 10 principles to create an active environment. Within criterion d also incorporate sports and recreational buildings and land, including playing fields. The addition of the above to criterion d, ensures that the whole spectrum of places to undertake formal and informal physical activity is covered. Sport England also notes the inclusion open spaces identified in the Open Space Strategy though there could spaces which are newly created or unfortunately missed off which should also be covered. A caveat should therefore be included to capture this.	Staffordshire County Council and NULBC have engaged in regular meetings between stages regulation 18 and 19 of the Local Plan process. ED035 Health Impact Assessment has been supported by SCC Public Health Team and includes their template guidance for core and full health impact assessments. Policy PSD6 at Regulation 19 includes use of the HIA in non-residential development. To make the policies objectives clearer, the Council created a separate RET4 policy specifically regarding Hot Food Takeaways, following engagement with Staffordshire County Council.
Policy requires more information regarding a mechanism for policy to be achieved (including retrospectively)	Sport England recommended that the policy include reference to Active Design Guidance principles to PSD6. This is included in criterion 1(a) of policy PSD6 'Health and Wellbeing' in the Regulation 19 version of the Local Plan.
Very limited sports and recreational areas in borough (e.g. Loggerheads)	
Out of town housing developments increase car dependency which increases obesity in the area	United Utilities recommended that the Council include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. This is considered in policy SE5 'Water Resources and Water Quality' criterion 4.
The high number of asthma sufferers may not be due to obesity but because the borough is surrounded by major road networks – M6, A500, A34	
Support the inclusion of a specific policy on health and wellbeing, but we would like to see more specific reference to actions and principles that will support and enable healthier outcomes for residents	<p><u>Addressing specific concerns</u></p> <p>Policy is too vague /lacks a mechanism for policy to be achieved</p> <p>At Regulation 19, the policy has accompanying evidence to include ED035 Health Impact Assessment in the evidence base, which supports the policy and explains in more detail the application of an HIA, details of the types of HIA, and actions for a developer to take.</p>
Proper infrastructure such as GP / Dentists for residents of new housing developments have not been mentioned in policy	
Would like to see a much wider scope in the policy, including emphasis on green infrastructure (not just spaces), paths, quality of public realm and support for active travel	
Staffordshire Joint Wellbeing Strategy aims to address the 4 priorities and these benefits come from the Green Belt therefore building should not take place on GB if council prioritises health and wellbeing	

Whole Plan Viability Assessment (April 2023) does not allow for Building for a Healthy Life standard as part of its building costs assumptions.	<p>Out of town developments increase car dependency which increases obesity in the area</p> <p>The Council recognises the importance of development in town centres. This policy in regulation 18 and 19 highlights the importance of applying active travel into all developments. The overall development strategy of the Local Plan prioritises growth in urbanised areas but there is still a need to distribute development across the borough.</p> <p>Proper health infrastructure is not referenced</p> <p>Infrastructure is considered in district policies in the Local Plan, for example, in policy IN1, supported by the Infrastructure Delivery Plan which has included engagement with the integrated care board.</p> <p>More emphasis on green infrastructure rather than just spaces</p> <p>The Regulation 19 policy includes green infrastructure and has been supported by ED022 Open Space and Green Infrastructure Strategy in the evidence base.</p> <p>Include towpaths as an existing accessible routeways that requires improvement</p> <p>Policy IN4 in the Regulation 19 plan includes reference to towpaths.</p> <p>Duplication of policy with PSD7</p> <p>The Council recognises that there is cross over amongst policy and in regulation 19 has restructured policies to avoid duplication.</p> <p>Using a Supplementary Planning Document creates a policy vacuum and should therefore not be used</p> <p>To support the regulation 19 policy, ED035 Health Impact Assessment has been written as part of the evidence base instead of an SPD.</p>
We suggest that paragraph 6.31 is currently reads as requiring the provision of new facilities and should be amended to include the improvement of existing accessible routeways such as towpaths.	
There is also opportunity to promote cross border improvements of accessible routes such as towpaths. Working with Cheshire East Council, Shropshire Council and City of Stoke-on-Trent to improve pedestrian and cycle connectivity for communities living close to the borders and seeking sustainable commuting options into the borough or local leisure for residents within the borough for improved health and wellbeing would promote the Vision and Strategic Objectives.	
Policy should be supported by a Health Impact Assessment	
Policy refers to rapid and full HIA – neither are defined in the policy	
Wording of policy unclear	
It would seem unreasonable and disproportionate for a planning application for individual dwelling to have to undertake a full Building for a Healthy Life assessment and indeed it is not designed for such use.	
Staffordshire Police - Fully support requirement for housing developments to achieve Building for a Healthy Life Standard (or as updated). Policy PSD6: Health and Wellbeing 1c “Welcome the reference to ‘safe’ as it relates to walking and cycling. It is the expectation that this would relate as much to the avoidance of opportunities for deliberate harm (and the fear of crime) as it does accidental harm.	
Staffordshire and Stoke on Trent Integrated Care Board - The delivery of more accessible and adaptable dwellings will of course go some way to preventing falls within the home which is a prevalent and often overlooked issue in the over 65 population. Similarly providing minimum standards both internally and externally for all housing will contribute to the prevention of mental health problems and the promotion of recovery as documented within studies	
Duplication of policy with PSD7 - Criteria 1b and 1c would be best incorporated into Policy PSD 7	

Policy appears vague as to what is required to be addressed through health impact assessment	
Do not agree with a separate SPD being drafted as it would leave a policy vacuum.	
Argue that development proposals go against the policy approach set out here.	
Staffordshire County Council - The first sentence begins with 'Supports public health initiatives and encourages healthy lifestyles and environments it is therefore not clear to what the support applies to.	
Staffordshire County Council - i. Subsection a. -We support the intention of including Health Impact Assessments (HIA) with development proposals and would like to discuss with you how this could best be implemented	
Staffordshire County Council - ii. Subsection b. "We support the requirement to meet Building for a Healthy Life Standard in new development. The Plan should also incorporate similar standards for non-residential development, including employment sites.	
Staffordshire County Council - Iii Sub section c. "The intention that development should provide opportunities for healthy living and promote mental wellbeing is supported, and we would also suggest including specific reference "maintain independence" However, in terms of how this is delivered the policy refers to good housing design. It is felt that 'good' in this context is subjective and should be defined more clearly. The Policy here would also benefit from referring to minimum standards agreed by NUL planners, and specifically to key criteria such as development providing access to healthy food growing spaces e.g. regular public transport access, community gardens & orchards and access to/protection of green space more generally.	
Staffordshire County Council - iv. Subsection d. It is not clear how the Plan would define 'unnecessary losses of green space, its implication is that at some point it becomes necessary to lose green spaces for development. The intention to protect green and open spaces is supported but the Policy should be reworded to make that clearer. The	

<p>policy would benefit from more focus on green and blue spaces, acknowledging the health benefits of protecting and enhancing existing spaces as well as promoting the introduction of new green and blue spaces with development.</p>	
<p>Staffordshire County Council - v. Subsection e. "Access to sports facilities and opportunity for recreation and leisure are essential for healthy lifestyles. However, it is not clear what constitutes "appropriate access" as set out in the policy. The Policy would benefit from clarity here about how new development can provide and support access to sport and recreation. We would be keen to see a focus on equity of access (e.g. free/affordable, all age/all ability) for physical activity and sport.</p> <p>vi. Subsection f. We acknowledge the Policy supports schemes that encourage life-long learning and skills training as these will help resident access jobs and improved earnings. We would also welcome specific reference to good jobs and meaningful activity, as these are evidenced to have a positive impact on health and wellbeing. Please also see comments in relation to Employment and Skills Plans in the Employment section of our response.</p>	
<p>Staffordshire County Council - Subsection g. Creating the conditions to help people to make healthy choices that will help adults and children reach a healthy weight is a public health priority, as set out in the Staffordshire Health and Wellbeing Strategy 2022-2027. To deliver this priority, the County Council and partners have implemented an initiative called Better Health Staffordshire. Better Health Staffordshire will address the factors driving excess weight, as well as promote healthy eating and active lifestyles, through the implementation of a whole systems approach (WSA).</p>	
<p>Staffordshire County Council - Sub points i to iii seek to control the opening of new hot food takeaways. This aligns with the healthy and safe communities' Planning Practice Guidance.</p> <p>Subpoint i. seeks to control the opening of takeaways based on their proximity to schools, which is supported in principle. In relation to the distance and time restrictions prescribed we believe these require</p>	

<p>further consideration. The Plan therefore should consider what the issues are around proximity of takeaways to schools and whether differing approaches are justified between primary and secondary.</p> <p>Subpoint ii. seeks to reducing the clustering of hot food takeaways in the town centres of Newcastle and Kidsgrove by setting out that no more than 2 hot food takeaways can be located adjacent to each other. Whilst this may be appropriate for design and place making initiatives its ability to control overall numbers of takeaways is questioned.</p> <p>Subpoint iii. is supported in requiring HIAs (Health Impact Assessments) for all applications for hot food takeaways. With regards to the supporting information in paragraphs 6.31 to 6.44 it is felt that more emphasis and signposting is needed to relevant evidence to support Policy PSD6. Paragraph 6.2 should refer to Borough Council committing to implementing the Better Health Staffordshire initiative and Staffordshire’s “healthy weight” priority via the Staffordshire Health and Wellbeing Board.</p>	
<p>United Utilities - UUW wishes to note that development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes.</p>	
<p>Audley Parish - would like to see a much wider scope in the policy, including emphasis on green infrastructure (not just spaces), paths, quality of public realm and support for active travel.</p>	
<p>Silverdale Parish - There is evidence of greater health inequalities in Silverdale (AECOM report 2023 Silverdale Parish Council) than found elsewhere in the borough. These health inequalities should be taken into account when decisions are made to allocate land for large housing estates putting additional pressure on health and community services in one ward.</p>	
<p>Loggerheads Parish – policy is currently too vague</p>	

Keele Parish - Some of the Green Belt areas that are included in the allocated sites are close to existing housing settlements and could be developed to provide cycling, walking trails designed specifically to motivate younger adults and children.	
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50. FDLP Policy PSD7: Design

Summary of Main Issues Raised	How the main issues have been taken into account
Staffordshire County Council - Development proposals should take account of the Staffordshire Residential Design Guide (and any updated version) which provides local guidance on Street and footway layouts for housing layouts. Please note this document is presently under review to ensure greater alignment with the National Model Design Code and Guidance.	<p>Staffordshire County Council has suggested proposals taking account of Staffordshire Residential Design Guidance which is currently under review to ensure greater alignment with National Model Design code. At regulation 19, PSD7 states that development proposals should take account of any locally adopted SPDs, National Model Design Code and Manual for Streets.</p> <p><u>Addressing specific concerns</u></p> <p>Design Policy should include BREEAM/ Passivhaus standards mentioned in the climate policy As BREAAAM standard is covered in CRE1, it has not been referenced in PSD7 to avoid duplication of policy requirements. The Final Draft Local Plan is designed to be read as a whole.</p> <p>Insufficient resources for smaller developments to undertake a design review. The policy in the final draft Local Plan highlights that the design review is for major proposals.</p> <p>National Gas Transmission Policy IN7 Utilities in the Final Draft Local Plan requires a consideration and co-ordinated approach to Utilities provision.</p> <p>Design matters may cause unnecessary delay at outline stage, and should be considered through full applications or reserved matters Developers should engage with the Council, the local community and relevant statutory consultees at the earliest opportunity to make sure the development appropriately responds to the unique character and sense of place in the Borough.</p>
The design policy should incorporate the BREEAM / Passivhaus standards mentioned in Climate Policy so that these standards at met	
Staffordshire Police - It is recommended that it is amended to read as follows – “Developments should ensure high levels of passive surveillance of streets, spaces and parking, including appropriate lighting, and making sure that the site layout and design minimises opportunities for crime, anti-social behaviour, and minimises the fear of crime. Design should incorporate Secured by Design Principles”.	
Policy PSD 7 refers to new development according with National Design Code, National Design Guide and any local design codes. This creates a potential for conflict between the requirements of codes at a national and local level, as they could contain variations and could therefore be incompatible with one another on specific items.	
There is not a need for smaller developments to undertake a design review not, is there sufficient resources for these to be undertaken by a developer	
National Gas Transmission would like the policy to include “taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.” This is because the increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.	
Criteria 1b and 1c to be included in Policy PSD7	

Design matters may cause unnecessary delay at outline stage, and it may be more appropriate for them to be considered through full applications or reserved matters stages. Evidence that this requirement is needed at this stage?	Include a definition of Design Review process. Information on the Design Review process is included on the validation pages of the Borough Council's website.
Include a definition of the Design Review process within the supporting text and/or the Glossary in Chapter 16.	Emphasis on green infrastructure and design, quality of the public realm and pedestrian and cycle connectivity
Policy PSD 7 would benefit from additional text that directs applicants to a Design Guide or a Design Code prepared in accordance with the principles set out in the National Design Guide	Building for a Healthy Life Standard emphasis green infrastructure and well-designed walking /cycle routes.
Often design principles are not fulfilled. Some authorities have designated land for self-builders to encourage diversity of design and innovation	National model design code is outdated The National Design code is referenced in the policy, the applicant should follow the most up to date version of this.
The idea of placemaking where residents are actively involved in shaping communities where they live sounds good but what about proposed developments active members of communities are against? E.g. SP11	Building for a healthy life standard should be in PSD6 or PSD7, not both. Noted. The Final Draft Local Plan includes building for a healthy life standard in policy PSD7. Reference is made to the standard in the supporting text of policy PSD6.
Historic England - The policy could specifically reference the historic environment and design considerations which may be relevant, including for example in Conservation Areas, as well as reference specific evidence base documents including but not exhaustive to Landscape and Townscape Character Assessments, which will aid prospective developers in understanding what is local character and local distinctiveness.	Design principles should encourage use of renewable and low carbon technologies. This is stipulated in policies CRE1 and CRE2
Greater emphasis on green design and infrastructure and quality of the public realm, in its own specific clause. Also, more emphasis on pedestrian and cycle connectivity	Early-stage design review of large sites should be mandatory At Regulation 19 stage, the supporting text 5.47 notes the importance of undertaking a design review at an early stage.
The date of the National Design Guide is 2021. The National Model Design Code was a consultation document and is no longer relevant.	Canal corridors should be included from the outset within the design principles stages The importance of Canals are highlighted in policy SE14 for example.
Policy PSD 7 repeats the requirements for housing developments to achieve Building for a Healthy Life standard. This should be addressed either in Policy PSD 6 or Policy PSD 7, not both	
Design principles should encourage use of renewable and low carbon technologies	
Paragraph 6.48 regarding an early-stage design review of large and complex sites should be mandatory rather than just encouraged.	

Part 5 should add that the public realm should be a place where passive surveillance should be promoted. Canal corridors should be included from the outset within the design principles stages and consultation with the Trust should be sought in the early stages to guide development on a case-by-case basis.	<p>National Grid - criterion 3 in the Final Draft Local Plan refers to the importance of a comprehensive and co-ordinated approach to development schemes. Taking account of utilities requirements.</p> <p>Audley Parish Council – Massing is reflected in point 2 (d). Matters of permeability and connectivity have been considered through the policy, including criterion 8.</p> <p>Keele Parish Council – the policy approach to self-builders is set out in Policy HOU 6 ‘Self Build and Custom Dwellings’ in the Final Draft Local Plan.</p> <p>Silverdale Parish Council – the individual site allocation sections consider the merits of individual sites.</p>
Design In clause 2, massing (d) should be added to (a)	
National Grid - NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets. Therefore, to ensure that Design Policy PSD7 is consistent with national policy we would request the inclusion of a policy strand such as: “x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”	
Part 5 should add that the public realm should be a place where passive surveillance should be promoted. Canal corridors should be included from the outset within the design principles stages and consultation with the Canal and Rivers Trust should be sought in the early stages to guide development on a case-by-case basis	
Audley Parish - In clause 2, massing (d) should be added to (a). There should be far greater emphasis on green infrastructure and quality of the public realm, in a specific clause. More emphasis could be made of pedestrian and cycle permeability and connectivity. Far greater emphasis should be placed on support for green design. Overall, the design policy lacks ambition. The date of the National Design Guide is 2021. The National Model Design Code was a consultation document and is no longer relevant.	
Silverdale Parish – SP11, 12 and 23 contradict this policy	
Keele Parish - We note that other authorities have designated land for self-builders to encourage diversity of design and innovation.	

51. FDLP Climate and Renewable Energy

Summary of Main Issues Raised	How the main issues have been taken into account
Building out of town development will increase car travel which will increase fossil fuel usage and air pollution	The policy approach has been supported by the Climate Change Adaptation and Mitigation Report [ED024]. It is also aware of viability implications of policy requirements as set out in the Council's viability study [ED004] alongside the development of national standards, including the Future Homes Standard.
With climate change so important, greenfield sites must be the last feasible option to prevent flooding	
How is NUL ensuring all new housing development are low carbon in line with the UK's net zero strategy	
Council has stated there are 1000 empty homes in Newcastle, refurbishing these will use less carbon and be in keeping with the council's vision of reducing carbon footprint	
Wording needs to be stronger to ensure the policies are seen as obligatory rather than optional.	
It is unclear what the council has done from since it declared a climate emergency regarding sustainable building development.	
United Utilities - currently evaluating all land owned by U UW within local authorities that could be used for renewable energy and developing a list of candidate sites. U UW would welcome discussion with NUL over this	

52. FDLP Policy CRE 1: Climate Change

Summary of Main Issues Raised	How the main issues have been taken into account
CRE1 refers to many aspects of other national regulations. It is established practice that other regulatory regimes must operate separately to this planning regime. Reference to the Building Regulations should therefore be deleted. Instead, the policy should be amended to add the locational context of Newcastle-Under-Lyme and how this relates to climate change requirements.	The Final Draft Local Plan does not go beyond building regulations, in line with the ministerial statement of December 2023. The evidence in the Climate Change Adaptation and Mitigation Report [ED024] has supported the introduction of energy standards in the Local Plan, tested through the Local Plan Viability Study [ED004].
CRE1, 5: related to provision of adequate space for physical protection measures however it is not clear what this requirement is aimed at which will make it challenging for applicants to demonstrate compliance.	Evidence in the Water Cycle Study supports the introduction of water efficiency standards. As the Local Plan is intended to be read as a whole, it is considered that the water efficiency standards are appropriately placed in the climate change policies.
Tree planting measures will take many years to be effective against climate change and therefore does not negate the removal of existing mature trees.	The positioning of Climate Change and Renewable Energy policies as standalone policies in the Plan highlights the importance of climate change as a priority in the Development Plan priority.
Reference should be added to walkable neighbourhoods (reducing the need for car use), including mixed use, retention of local facilities, support for home working and ease of pedestrian movement	Policy SE13 'Soil and Agricultural Land' considers the importance of soil resources.
Environment Agency - We encourage you to identify climate change as an overall Development Plan priority. Policies within the local plan should align with national net zero targets and mitigation policies. We note the detail within this policy in respect of water efficiency standards but would suggest this be better placed within the Water Resources policy section and be cross referenced here.	Following comments from Historic England, criteria 11 of Policy CRE1 'Climate Change' refers to the historic environment within the climate change policies.
Historic England - We would recommend a clause that considers the role of the historic environment within the climate change agenda and how measures need to be appropriate in the context of the historic environment to protect the significance of heritage assets including their setting, as well as the need to consider appropriate retrofitting of heritage assets. There should be a reference in the reasoned justification to the historic environment and climate change.	
Natural England - Our mapping system shows that the plan area includes areas of peat -a few of these areas are part of RAMSARs, SSSIs or are a	

Site of Biological Importance (SBI) but there are other areas that have no protection at all. Peatlands are our largest natural carbon stores, and it is essential that these are protected and restored where possible. We would advise including within this Policy protection of peat.	
United Utilities - sustainable surface water management should be a critical element of the policy.	
Audley Parish - Reference should be added to walkable neighbourhoods and green materials/ construction	
Silverdale Parish – SP11, 12 and 23 contradict this policy	
Keele Parish - The district heat network at Keele University is currently very limited.	

53. FDLP Policy CRE 2: Renewable Energy

Summary of Main Issues Raised	How the main issues have been taken into account
The phrase “ <i>should provide for at least 10% of their energy needs</i> ” should be deleted as it is insufficiently strong and substituted with <i>the phrase “must provide at least 10% of their energy needs”</i> .	Reference to ‘should’ is considered appropriate within this context to reflect that the policy does make reference to the requirement being delivered unless the applicant can clearly demonstrate that having regard feasibility and viability it is not possible to provide for at least 10%.
Staffordshire Police - CRE2, 5: “Associated development and buildings such as access roads, fencing and lighting must be designed to minimise its visual impact whilst ensuring public safety and without compromising site security”. Should be noted in policy that associated development does not compromise site security.	Staffordshire Police – noted, additional text has been added to criterion 5 to CRE2 ‘Renewable Energy’.
Scope to ensure solar capture is provided as a condition of building works	United Utilities – noted.
United Utilities - United Utilities is assessing all land within local authorities for renewable energy use and developing a list of potential sites. Aligning site selection with local, regional, and national policies is crucial. As part of preparing a new local plan, we welcome discussing the delivery of renewable energy sites and new opportunities.	Environment Agency – the Policy is supported by climate change adaptation and mitigation report [ED024] and balanced with viability implications [ED004].
Environment Agency - We welcome the inclusion within the Policy that all major developments should provide for at least 10% of their energy needs from renewable or low carbon energy generation on site unless the applicant can clearly demonstrate that having regard to the type of development and its design, this is not feasible or viable. – However, given the climate crisis, would a more ambitious target be more appropriate?	Historic England – criterion 3(e) refers to the importance of the historic environment.
Historic England - additional detail will be required in the reasoned justification text and how heritage is being considered in relation to proposals for other types of renewable energy technologies.	Canal and Rivers Trust – criterion 1 refers to the need for a energy statement when considering renewable or low carbon energy sources.
The Canal and Rivers Trust, in our response to the Issues and Options Consultation for this draft plan suggested the inclusion of an Energy Statement with proposals. This would enable the consideration of all potential sources of energy so the selection of the lowest feasible carbon option could be made on a case-by-case basis. The inclusion of the need for Energy Statements would be a useful inclusion within the policy and	The council will review the policy wording and approach in the light of consultation responses received and any changes in national planning policy / guidance.
	Natural England – criterion 3 (b) refers to the wording proposed by Natural England in their representation.

supporting text in providing renewable and zero-carbon sustainable development. This would improve the aspiration of this policy, whilst providing a clear means of achieving the aims of the policy. It would also provide a means of monitoring the success of the percentage aims of the policy and may even allow the percentage to be more aspirational	
Natural England - We advise changing this paragraph to: "Habitats and species of International, National and local importance." In line with paragraph 175 of the National Planning Policy Framework (NPPF)."	
CPRE Staffordshire - It is unclear what the council has done since it declared a climate emergency in 2019	

54. FDLP Housing

Summary of Main Issues Raised	How the main issues have been taken into account
No need for more houses on the Borough	The council has reviewed the policy wording and approach in the light of consultation responses received. The Final Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment ED001 (2024, alongside previous versions). This considered matters such as the approach to overall housing requirements but also the housing needs of different groups of people / society including the requirement for affordable housing.
The local plan should help to deliver accommodation for older and disabled people and the specific needs of other groups.	
Should be insisting on Lifetime Homes standard which ensure homes are adaptable and suitable.	
Need to provide a mix of new homes to support local communities	

55. FDLP Policy HOU1: Affordable Housing

Summary of Main Issues Raised	How the main issues have been taken into account
Direct conflict between HOU 1 and PSD4 which needs to be resolved.	<p>The council has reviewed the policy wording and approach in the light of consultation responses received. The Final Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment (2024, alongside previous versions). This considered matters such as the approach to overall housing requirements but also the needs of different groups of people / society including the requirement for affordable housing.</p> <p>The Final Draft Local Plan was supported by a viability study (ED004).</p> <p>Staffordshire and Stoke Integrated Care Board – accessible and adaptable dwelling criteria is included in policy HOU3 Housing Standards. Policy HOU5 Specialist Needs Housing refers to older person accommodation and other specialist forms of housing.</p>
Reference to older persons housing should be made with respect of affordable housing	
The Council should look to provide an element of flexibility in implementing the policy based on prevailing market conditions and site-specific viability considerations.	
Criteria 1 of the policy sets affordable housing percentages. Question whether the percentages identified are realistic and viable.	
The location of the brownfield sites in the high and low value zones should be confirmed to ensure the correct percentage of affordable units is applied, subject to viability.	
The policy should implement a blanket 30% affordable housing policy for all sites across the Borough, unless a site-specific viability appraisal suggests otherwise	
Staffordshire and Stoke integrated care board - The delivery of more accessible and adaptable dwellings will of course go some way to preventing falls within the home and provide a greater degree of independence for an ageing population therefore this approach is supported. Also contributes to the prevention of mental health problems. It is also noted that the policy does not make explicit reference to other forms of supported housing, including housing which meets the needs of people with a learning disability and autistic people. It is recommended this is incorporated at the next stage.	
Broadly supportive of affordable housing percentages A higher percentage of affordable homes is required	
As the population of the Borough is declining and ageing, then affordable housing should provide for single people and couples.	
Question the reduction from 30% to 15% for brownfield sites in low value zone	

Criteria 1a should be amended to indicate a percentage of affordable housing on Green Belt sites	
Criteria 2 of the policy requires the affordable housing to be whatever the Councils Housing Team decide to request. The policy should allow for flexibility and negotiation that reflects the site location and characteristics and not just the most up to date evidence of local housing need.	
Draft Policy HOU1 heavily restricts the delivery of notable affordable housing products, including affordable rent and shared ownership. Reassured to see that Part 2 of Draft Policy HOU 1 does allow for the tenure split to be discussed on a site-by-site basis and be appropriately evidenced to demonstrate local needs.	
Criteria 3 of the policy suggests that on-site affordable housing should be provided. In relation to providing off-site provision, it is unclear how off-site affordable housing could be secured through a planning application and Section 106 agreement relating to a different site, and therefore it is unclear what a developer would need to do to show compliance with the policy. Payment in lieu of affordable housing is the more typical approach to securing funds for affordable housing delivery elsewhere.	
Criteria 3 allows some flexibility concerning off-site affordable provision. The document refers to 'exceptional circumstances. Examples of exceptional circumstances should be provided in the policy.	
Part 4 of Draft Policy HOU1 seeks to secure affordable housing in perpetuity - There is currently nothing in the NPPF (2021), or within Planning Practice Guidance, that requires all affordable housing to be secured in perpetuity. Affordable housing should only be secured in perpetuity on rural exception sites.	
Criteria 6 – not clear what fair dispersal means - A better option would be for policy to refer to the need to balance the needs of registered affordable housing providers to manage tenure and distribution of dwellings against the benefits of pepper potting across the sites.	
Part 7(b) of Draft Policy HOU 1 should allow applicants to demonstrate local affordable housing needs for rural exception sites through sources	

such as the housing register and affordability indicators, in addition to local needs assessments and neighbourhood plan evidence bases which are already listed in the draft policy.	
Criteria 7(c) requires that exception sites only come forward where there are no other suitable and available sites within the Development Boundary of the village or rural centre. This is an unreasonable expectation and would frustrate the delivery of affordable housing.	
Part 7(e) states that an exception site should not exceed a maximum of 1 hectare in line with the definition of a small site. While footnote 7 specifies that in the context of Exception sites, small is defined as a site which should not exceed whichever is the lesser of 5% of the number of dwellings within the main built-up area of the village or 1 hectare, the Draft Local Plan Glossary does not set out what a small site is.	
Clause 7(G) contains too much uncertainty that will hinder the process of delivery. A developer will only undertake a FH scheme if they have available land, a landowner willing to sell at a reduced price and most importantly a strong belief that these homes they pay to build will be sold to a first home buyer. If there is in due course insufficient demand, then any linked S 106 will ensure these homes are then offered to an RSL.	
First Homes (FH) have the benefit for a developer in that they can be administered without the necessary involvement of an RSL, this makes them easier and simpler to administer and deliver. Their protection in perpetuity can be supported by a section 106 undertaking.	
It is assumed from the supporting text the Council intend to apply only the national First Homes eligibility criteria to First Homes within the authority area. This reflects the emphasis on entry-level homes outlined in paragraph 72 of the NPPF and demonstrates the Council's commitment to securing and supporting homes for first time buyers.	
Reference to £250,000 in paragraph 8.2 is not reflective of what a first-time buyer can afford.	
Dispute some of the boundaries for the high value area – for example Clayton, Westlands and Thistleberry should be included.	

Viability assessment does not appear to have tested products for older persons housing, and this should be made clear in the policy.	
If the points being made in the footnotes are substantial enough to need to be referenced in the policy, surely it is substantial enough to be included within the policy itself.	
Lack of emphasis on shared ownership products and social housing for rent.	
No support for a report to be verified by the council's own viability report simply because this ends up with a developer paying twice for reports because the council would require their reports to be paid for by a developer in addition to their own. The paragraph should read: <i>"Where it has been demonstrated with robust justification that the proportion of affordable housing sought would not be viable, the maximum proportion of affordable housing will be sought that does not undermine the development's viability. Financial viability assessments conforming to an agreed methodology from a list of at least 5 agreed assessors prepared by the council will be required. These will be paid for and instructed by applicants."</i>	
Audley Parish - emphasise the importance of affordable housing policy being applied consistently through the development management process	
Keele Parish - Should 1a be amended to indicate a percentage of affordable housing on Green Belt sites?	

56. FDLP Policy HOU2: Housing Mix, Density and Standards

Summary of Main Issues Raised	How the main issues have been taken into account
Staffordshire and Stoke-on-Trent Integrated Care Board - delivering healthcare within settings such as care homes and extra care facilities requires a collaborative approach. To deliver services within concentrated locations there will be, in some cases, the need to consider expansion of primary care estate capacity to accommodate the series of additional roles required to provide the multi-disciplinary team support needed for this service.	The council has reviewed the policy wording and approach in the light of consultation responses received. The Final Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment ED001 (2024). This considered matters such as the approach to overall housing requirements but also the needs of different groups of people / society including the requirement for affordable housing.
Staffordshire and Stoke-on-Trent Integrated Care Board – It is also noted that the policy does not make explicit reference to other forms of supported housing, including housing which meets the needs of people with a learning disability and autistic people. The ICB understands that DLUHC (Department for Levelling Up, Housing and Communities) (Department for Levelling Up, Housing and Communities) (Department for Levelling Up, Housing and Communities) are commissioning independent research to understand the size, cost and demand of this sector with findings due towards the end of 2023. It is recommended that these findings are incorporated within the Plan	The policy has been restructured so that there is a policy on housing mix and density (HOU2) and Housing Standards (HOU3) in the Final Draft Local Plan. Criterion 2 of policy HOU2 (Housing Mix and Density) notes how density should consider other matters including site context and the proximity of historic assets for example.
The use of the word 'should' and not 'must' is supported. It provides the flexibility necessary.	The policy, in criteria 3 requires reference to the most up to date evidence in terms of the type and size of residential development. The outcomes of the Housing and Economic Needs Assessment are provided in the supporting text as an illustration of the latest evidence on such matters.
Criteria 1 The Councils approach to optimising densities is discussed in paragraphs 5.11 - 5.15 of the Exceptional Circumstances for Green Belt Release (2023) report. There seems to be a difference in the density being sought and paragraph 5.13 of the Green Belt exceptional circumstances report. Furthermore, this means that more greenfield / Green Belt release will be needed to meet the requirements in the rural areas. Recommend that they are reviewed to ensure that they are appropriate for each area / site, and that the evidential basis is clear.	Housing standards has been separated into another policy, HOU3 Housing Standards and considers accessibility standards and national described space standards. Accessibility standards are justified through the Housing and Economic Needs Assessment. Space standards through the Nationally Described Space Standard report.
Criteria 1 should be amended as follows: 1. Residential development proposals will be expected to achieve the following net densities, unless	

the considerations outlined at criteria 2 indicate that an alternative residential density would be more appropriate	
Criteria 1 - The density formula could work against balanced and diverse new housing across the Borough – different densities in urban and rural areas.	
Criteria 1 - The Local Plan must reassure residents that more housing per hectare will not produce poorly designed, inferior homes and environments	
Criteria 1 - The reference to density requirements in neighbourhood plans is welcomed, but should be amended to refer to densities or 'other design requirements'	
Criteria 1 - the first sentence of criteria 1 should be amended as follows: [Note: text in brackets to be added] 1. Residential development proposals will be expected to achieve the following net densities (unless the considerations outlined at criteria 2 indicate that an alternative residential density would be more appropriate);	
Criteria 1 of this policy is compromised by the loss of the District Centre category - With Silverdale included in the Strategic Centre of Newcastle the proposed development of 40 – 50 dwellings per hectare.	
Criteria 3 - suggested that either criteria 3 is amended to simply require housing mix or be provided in accordance with the latest evidence of need	
Criteria 3 – not clear whether this is a requirement or a guide	
Criteria 3 - Provision needs to be made in an ageing community for Pensioners bungalows	
Criteria 3 - The thresholds as set out regarding tenure mix and percentage of bedroom mix should not be arbitrarily applied. Flexibility will be important in the application of the policy.	
Criteria 3 should be amended to simply require housing mix to be provided in accordance with the latest evidence of need or site-specific considerations / constraints.	

Criteria 3 - Additionally, and instead of the use of the word 'bungalow' can this be replaced with 'housing suitable for older people'. This will allow for lifetime homes.	
Criteria 3 - The market mix tested within the Viability Appraisal differs significantly from that set out in criteria 3	
Criteria 3 requires all major housing development sites to contain a mix of types and sizes including for elderly people. However, this requirement would have implications for smaller development sites of 10 units as such small sites may not be able to deliver elderly accommodation in the form of bungalows etc if there are other design constraints that need to be considered	
Criteria 3 of this policy references the need to consider the specific housing needs of older people. It is unclear what is meant by the wording 'having regard to location and site size' within the policy. Further details and explanation about this should be provided in the supporting text.	
Criteria 3 - The prescribed mix in the policy is unduly restrictive and would prevent the delivery of aspirational houses on smaller sites	
Criteria 3 - The evidence within the HENA supports the decision to have 75-80% of new residential development as houses, with the evidence suggesting a requirement of 76% as houses. However, the HENA caveats this, and states that this data continues to represent only illustrative modelling using available evidence and should not be prescribed as an explicit requirement for all sites given the need to respond to changing market demands, local context and viability factors.	
Criteria 3 - If general density prescriptive requirements are imposed in such matters, and which we consider are best left as general guidance (rather than strict policies!) and the marketplace	
Criteria 4 - National Described Space Standards – should consider transitional arrangements	
Criteria 4 - There are concerns that the blanket application of the NDSS across all residential development, including affordable tenures, will undermine the viability of many development schemes. It is not essential for all dwellings to achieve these standards to provide good quality living.	

For affordable housing, there may be instances where achieving NDSS is impractical and unnecessary.	
Criteria 4 - At present the Draft Local Plan evidence base does not justify the need to apply NDSS across all residential development in the terms of the planning practice guidance – Need, Viability and Timing	
Criteria 4 - We would suggest amendment of clause 4 to refer to 'meet or exceed' Nationally described space standards.	
Criteria 5 - With just 9% of the housing stock in England having basic access features, we know that too many disabled and older people are living in unsuitable housing, which can impact on their ability to live independently. This is why inclusive, accessible homes are a must for everyone	
Criteria 5 - supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Newcastle-under-Lyme	
Criteria 6 requires major developments and specialist housing for older people 10% There may be a need to differentiate between Part a) and part b) of M4(3) technical standards. The glossary may be an appropriate place to set this out as a definition, or it could be appropriately referenced via a footnote.	
Criteria 6 - recommends that 10% of all new homes meet Part M4 (3) Standard (wheelchair user dwelling) irrespective of being major developments or specialist housing	
Criteria 6 of the Draft Policy requires major residential developments and specialist housing for older people to provide 10% of the dwellings as Building Regulations Part M4 (3)(2)(a) wheelchair adaptable dwellings. Opportunity is taken to remind the council of the viability implications of such policies	
Criteria 7 - Amend point 7 Specialist housing for older people or people with special need will be supported provided that: a. (delete) b. It is designed to meet the requirements of residents with a particular focus on social, physical, mental and / or health care needs; and c. The scheme	

has good access to public transport, healthcare, shopping and other community facilities for its residents, their visitors and on-site workers The above amendments would provide a more positive policy support for much needed older persons housing	
Criteria 7 - why is justification required, A developer will only build a costly C2 development for older people if they believe there is a market.	
Policy addition There is growing evidence that many people wish to grow more of their food at home and in a trend for organic food. Modern housing layouts neither provide for allotments to serve their residents or for gardens of sufficient size to allow for more than minimum play and recreation space.	
It is notable that the viability study tested 5 scenarios for residential development. None of these included 1-bed units, nor all of M4(3) dwelling costs. This can all impact on viability.	
The Parish Council at Madeley are concerned to ensure that the relevant housing need is met. The trend within Madeley Parish has been for developments of larger family houses to be constructed and provided for ownership and/or shared ownership schemes in respect of the provision for affordable housing elements. The Parish Council consider that the housing need in the area is for increased availability of social rental properties as families are finding themselves forced to leave the area due to a lack of availability of suitable properties which is detrimental to the development of family units within the Parish boundaries.	
The policy is not clear as to whether sheltered housing and extra care housing would fall into the definition of C2 or C3 or not or whether the Council is supportive of sheltered, extra care as well more specialist older persons housing such as care homes.	
It is unclear what the status of the footnotes are. Any potential for confusion or misunderstanding in policy wording should be avoided.	
Audley Parish - The reference to density requirements in neighbourhood plans (Clause 1) is welcomed but should be amended to refer to densities or 'other design requirements. The reference to neighbourhood plans in clause	

3 is also noted. We would suggest amendment of clause 4 to refer to 'meet or exceed' Nationally described space standards.	
<p>Keele Parish Council - Point 1 of this policy is compromised by the loss of the District Centre category.</p> <p>As any development of Keele Golf Course would be a major development can we assume that this policy would result in 40% of the homes being 1-2 bedroomed and 20-25% being bungalows or flats?</p> <p>Regarding point 7 we would expect all development in the Borough to be sustainable and therefore provide "good access to public transport, healthcare, shopping..."</p> <p>We would like to know the evidence that will be sought to justify the need for Class C2 accommodation and how "good access to public transport etc" will be assessed.</p>	
Bradwell, Porthill, Maybank and Wolstanton Parish - There is not enough about diversity of house supply (particularly affordable and smaller properties).	

57. FDLP Policy HOU 3: Gypsy, Travellers and Travelling Showpeople

Summary of Main Issues Raised	How the main issues have been taken into account
Environment Agency - The intentions of this policy may be better delivered through the allocation of specific sites to support the Gypsy/ Traveller communities.	<p>The council prepared evidence in the form of a Gypsy and Traveller Accommodation Assessment (2024, ED018) and a Gypsy and Traveller Site Selection Report (2024, ED019) for the Final Draft Local Plan.</p> <p>The approach in the final draft of the Local Plan will also be informed by revisions made to Planning Policy for Traveller Sites which was published on the 19 December 2023.</p> <p>Reference to the inclusion of recycling has been included in policy criterion 2(G)</p>
Environment Agency - Land use in this respect could be considered highly vulnerable or more vulnerable in terms of its flood risk classification, depending upon the permanent /temporary nature of the associated pitches.	
Environment Agency - Sites should have regard for the protection of groundwater and ensure appropriate provision of utilities and services including foul drainage arrangements to minimise pollution to the water environment and avoid proliferation of non-mains drainage Policy wording section 2.g: “Make provision for waste to be stored appropriately for disposal and be collected in an efficient manner” – this should also include provision for recycling.	
Historic England - welcome the reference to heritage. If the Council decides to allocate sites we will respond specifically at that time.	
Staffordshire Police - It is recommended that reference to the document Places we are proud of A Short Guide to Providing and Managing Sites for Gypsies and Travellers (National Policy Advisory Panel on Gypsy and Traveller Housing, 2021) is included in related documents	
A site already exists at Cemetery Road	
Criteria 1 - note that in 2020, the Borough Council and Stoke City Council conducted an assessment which confirmed that for the period 2020/21 through to 2036/37, 8 permanent pitches would be needed. To date planning permission for 4 pitches has been given, plus approval for 1 other pitch. It is regrettable that the Borough Council is still not able to identify a complete complement of sites and this issue remains outstanding.	
The new local plan should ensure suitable provision for future sites, to prevent future contested planning applications in unsustainable rural locations. Concerned at the rejection of all suggested sites.	

Support future location of traveller sites which are only in sustainable locations - close to public transport, local amenities and urban services.	
The site should be considered for transit provision – reference made to the position in Warrington	
Maer & Aston Parish – Supports that Blackbank cannot be expanded due to location	

58. FDLP Employment

Summary of Main Issues Raised	How the main issues have been taken into account
Opportunities could exist in utilising warehousing developments to accommodate solar panels, rather than taking up additional land for this purpose	<p>The Final Draft Local Plan is supported by detailed evidence including the Housing and Economic Needs Assessment (2024) ED001. This considered matters such as the approach toward and need for additional employment land in the Borough. Allied to this, the merits or otherwise of allocating strategic employment site(s) in the Local Plan are evaluated within the Strategic Employment Site Assessment 2023 (ED002a), & its 2024 update (ED002). This considered three distinct locations, two of which (AB2 & KL15) are allocated within the Final Draft Local Plan. Issues of employment land supply more generally are detailed as part of ED001 Housing & Economic Need Assessment 2024.</p> <p>Employment policies (EMP1-3) of the Final Draft Local Plan explain where development proposals for such uses will be acceptable in principle, with recognition made of the value of the production of employment & skills plans in enhancing local employment & training opportunities.</p> <p>Within the Final Draft Local Plan, AB2 & KL15 each has a discrete policy to set the parameters for their respective development (as part of Section 13 Site Allocations). This addresses a breadth of issues such as green infrastructure, access and heritage impacts that will serve to positively shape the proposals and mitigate as far as possible any consequent harm.</p>
Historic England - Recommendation made to reference to the role of heritage tourism and how it can be beneficial for economic development as well as to assist in maintaining heritage assets.	
Opposition to the inclusion of strategic employment sites as a component of the overall development strategy (regarding PSD1)	
Inclusion of the strategic employment sites would far exceed the identified hectareage of local need. The availability of existing premises & the scale of proposals and units is also questioned. In-commuting from outside the Borough allied to transport network issues (including road safety, pollution & construction vehicles movements) were highlighted. Impacts on neighbouring housing & existing residents. Infrastructure pressures & loss of countryside. Serve to attract high carbon industries.	
Keele Science Park is regarded as an asset to the Borough & its extension would provide highly skilled jobs, as well as taking advantage of its links to the Borough's strategic core in terms of travel and economic benefits. Opportunities also to create high quality design and satisfy the aspirations of business as well as facilitate high-value economic growth.	
The employment sites in Appendix 2 are welcomed & will allow economic growth in the Borough. The absence of such sites would make the area less desirable, offer few job prospects and not attract outside investors	

59. FDLP Policy EMP1: Employment

Summary of Main Issues Raised	How the main issues have been taken into account
Perceived vagueness of policy wording leaves the Council vulnerable to inappropriate development.	<p>The Final Draft Local Plan is supported by detailed evidence including the Housing and Economic Needs Assessment (2024) ED001. This considered matters such as the approach toward and need for additional employment land in the Borough. Allied to this, the merits or otherwise of allocating strategic employment site(s) in the Local Plan are evaluated within the Strategic Employment Site Assessment 2023 (ED002a), & its 2024 update (ED002). This considered three distinct locations, two of which (AB2 & KL15) are allocated within the Final Draft Local Plan. Issues of employment land supply more generally are detailed as part of ED001 Housing & Economic Need Assessment 2024.</p> <p>Employment policies (EMP1-3) of the Final Draft Local Plan explain where development proposals for such uses will be acceptable in principle, with recognition made of the value of the production of employment & skills plans in enhancing local employment & training opportunities. The</p>
Identifying sites for industrial or commercial development is essential for the Boroughs future prosperity and a mix of sites, differing in size and location, should feature in the Local Plan. New strategic employment sites should avoid a piecemeal or ad hoc approach to development by adopting a masterplan approach, which should be vetted by the Council prior to commencement of any works.	
The area might not be any further advanced industrially/economically than it was ten years ago, under the current Development Plan. Additionally, the work force is heavily weighted in favour of 'clean' industries un/semi-skilled industries.	
Provision should be made at the outset for at least two strategic employment sites. With reference to representations made elsewhere, the preferred sites in this regard should be AB2 and KL15	

<p>Employment development more generally should not be on Green Belt land. Significant opposition to development on AB2 for reasons including it is unlikely to generate significant employment for the residents of the borough. The proximity to the M6 with links to Greater Manchester, Cheshire, Merseyside and the West Midlands means it is more likely to pull in a workforce from those areas than from the borough given the limited public transport options. Site will significantly increase the flow of traffic in and around an area that is already regularly problematically congested and has a knock effect to the local roads of the village (Audley). Exceptional circumstances for its development do not exist.</p> <p>Would create low skilled & low paid jobs and the suggested number of roles that would be established is felt to be exaggerated. Automation may take over these roles in the medium term. The challenges of this site as highlighted in the Local Plan Issues & Options are valid. There is not an under-supply of employment land or broader employment issues in the Borough. If HENA implies a need for between 36.5 and 68.8 hectares of employment land, why are strategic options which far exceed these figures being considered? Other development such as Chatterley Valley are already coming forward. Uses would be carbon intensive. Flood risk. Unsustainable location on the edge of the Borough.</p>	<p>changing nature of working arrangements such as working from home are also recognised, as well as the operational requirements of lorry parks and freight storage. Policy RUR1 deals with rural matters & the diversification opportunities that could be explored.</p>
<p>Greater recognition should be made of the changes that occurred because of COVID, on home working and the need for very local facilities to support home-based (or partly home-based) workers.</p>	
<p>The policy has an urban focus & an additional clause should be added to support agricultural diversification and agri-business. There should also be recognition of the importance of micro and small business development, including creative and knowledge-based activities. Much economic activity is based on SMEs (Small to Medium Enterprise).</p>	

Staffordshire County Council - The policy wording should place a greater emphasis on the requirement for high quality sustainable transport connections.	
Staffordshire County Council - No recognition is made of the needs of freight and the requirement for local planning authorities to plan for freight. The site AB2 is for distribution/manufacturing and therefore consideration of adequate lorry parking and welfare facilities will be critical. It is noted that there is a proposal for lorry parking associated to this site within the employment site assessment report, however the policy should contain wording requiring lorry parking/welfare facilities for large employment sites to ensure consistency for future sites/applications that come forward during the plan period.	
Support for the growth ambitions of Keele University, including the extension to the Science Park as referred to via site reference KL13, and the details expressed in the University's Masterplan. It is felt this would bring high skilled jobs and support the Borough's Local Plan strategic objective of growing employment.	
Strategic employment locations (if allocated) are likely to take a significant time to be built out and would not come forward within the period of a referred to business' expansion plans (which would be needed in the very early stage of the Local Plan time horizon). It is considered those strategic sites would be more likely to fulfil a different employment need; relating to more logistical employment uses.	
Whilst there is no objection with a policy which supports the expansion and intensification of existing employment sites, it is considered that in the absence of an allocation for White Rock (area defined on a map) as a designated employment site, this policy would be unsound. Technical reports to highlight the mitigation of ecology and contamination issues on the site are also provided. Arguments made as to open space accessibility improvements & the stance on Green Belt.	
Employment sites in the local area of Audley & Bignall End have been mismanaged previously and these under-utilised areas should be	

revisited in the first instance. Reductions in the population further justify this stance.	
<p>Audley Parish - APC would like to see greater recognition of the changes that occurred as a consequence of COVID, in particular on home working and the need for very local facilities to support home-based (or partly home-based) workers.</p> <p>The policy does have an urban focus. An additional clause should be added to support agricultural diversification and agri-business.</p> <p>There should also be recognition of the importance of micro and small business development, including creative and knowledge-based activities.</p> <p>Much economic activity is based on SMEs.</p>	

60. FDLP Retail

Summary of Main Issues Raised	How the main issues have been taken into account
Historic England - We recommend including a reference to the role of heritage tourism and how it can be beneficial for economic development as well as to assist in maintaining heritage assets.	A suite of retail policies has now been added to section 9 (Retail) of the Final Draft Local Plan. This has been informed by the Retail and Leisure Study (2024 update, ED010). Heritage considerations are referenced in the Policies, for example RET4 (Newcastle-under-Lyme Town Centre, criterion 3).
Village retail is a must for elderly people & in reduction of pollution in travelling into town.	
More parking provision is needed for businesses especially if Audley village is to grow further in size.	
Over time, shopping has evolved, with people preferring local supermarkets and internet shopping. Most villages have sufficient shops that are just local small outlets, and this is quite sufficient for most villages in the area.	
The plan should focus on renewing town centres, converting above shops or empty buildings, and reducing antisocial behaviour by incorporating residential areas and improving public transport links.	
Audley Parish – Policy seemingly based on outdated assumptions	

61. FDLP Policy RET 1: Retail

Summary of Main Issues Raised	How the main issues have been taken into account
The need for more shops is questioned due to the existence of 20-30 vacant shops in Hanley and Newcastle.	<p>Wolstanton Retail Park is an out of centre retail park and not a designated centre in the Local Plan. A suite of retail policies has now been added to section 9 (Retail) of the Final Draft Local Plan. This has been informed by the Retail and Leisure Study (2024 update, ED010). The retail hierarchy set out in policy RET1 serves a different purpose to the settlement hierarchy set out in the PSD2 Settlement Hierarchy. The policy approach in the retail section is consistent with that in the National Planning Policy Framework.</p>
Policy not easy to understand for the public.	
Newcastle and Kidsgrove, once popular shopping and coffee spots, require extensive work to revive their vibrancy, attract visitors, and create attractive apartments.	
Concerns on the impact that the Roebuck Centre and Castle Walk have had on the historic town centre.	
No reference to Wolstanton Retail Park and how the Plan would relate to changes to the Retail Park.	
Rural centre car parks are often full. More traffic would make it worse.	
Policy RET1 should acknowledge that there are the bones of a local centre alongside the administrative boundary between the borough and the city of Stoke-on-Trent in Packmoor/ Newchapel. The proposals for Bent Farm include a small parade that would include a convenience store and other small-scale units which would add to this and thus create a Local Centre.	
Concerns that this policy is based on outdated assumptions. Use Class E includes retail but also a range of other uses. There is a current emphasis on diversification of high streets, a better policy heading may be “Town and Village Centres and High Streets”. High Streets rely on a mix of retail, food and drink, recreation, cultural uses, community facilities and other local facilities. Considering the importance of limiting negative impacts from out-of-town retail.	
The council should focus on providing more diverse retail options in Newcastle town centre, addressing vacant shops and stalls. They should oppose the development of new retail areas and preserve existing areas to drive foot traffic, as physical shopping declines due to the pandemic and online retail modernisation.	

<p>The section on retail in PSD 2 is confusing due to the absence of certain facilities for rural retail centres, such as Keele, which lacks the necessary facilities, it is not clear which facilities provided by the University and the village together make it a Rural Centre.</p> <p>Silverdale, recognised as a Retail District Centre, is consumed in other sections of the plan as part of the Urban Centre.</p> <p>A consistent settlement hierarchy and allocation are needed for the plan to be fit for purpose. More focus should be placed on urban strategic centre regeneration to encourage retail growth.</p>	
<p>Keele Parish - The Role and Tiers in Table 2 do not match those in the settlement hierarchy in PSD 2. Keele is missing altogether in this section, as it obviously does not have the retail facilities needed for a rural retail centre. If this is the case, then it is not clear which facilities provided by the University and the village together make it a Rural Centre.</p>	

62. FDLP Infrastructure and Transport

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Suggestions as to how emissions could be curbed via highways improvements in Kidsgrove. As part of this, electric vehicles can be incredibly supportive to the energy infrastructure in the local area with the progress being made on vehicle to grid technology. Public transport's important role in utilising hybrid & electric technologies is also highlighted, with prospective sanctions for those highly polluting vehicles that remain.</p>	<p>The Final Draft Local Plan was informed by transport and infrastructure evidence including the Infrastructure Delivery Plan (ED003). Ongoing engagement with organisations such as Staffordshire County Council (who have responsibility for services such as education), National Highways & United Utilities has also informed the approach taken. The Water Cycle Study (ED014) & Strategic Flood Risk Assessment (ED013) are as well significant facets in the understanding of issues related to infrastructure. A wide range of both strategic & non-strategic policies (IN1-IN7) serve to set a positively prepared framework to support infrastructure related development, including those for community facilities, active travel, parking, and for telecommunications.</p>
<p>National Highways -Sites have been identified from the Policies Map that may have the potential to impact the operation of the Strategic Road Network (SRN) in the area. Should any of the sites be allocated in the final Local Plan, further assessment work may be required to ascertain the impact (including the cumulative consequences) on the SRN and to determine the need for mitigation. Recommendation is made that a Strategic Transport Assessment (STA) be produced to support the development of the Local Plan. Allied to this, establishing a Transport Working Group (TWG) to agree the methodology, assessments and infrastructure requirements to aid the plans development & adoption would be beneficial. Engagement with surrounding districts in identifying the most strategic, high-level schemes will be valuable through mechanisms such as Statements of Common Ground.</p>	
<p>United Utilities - Support is requested of the Council for future investment in infrastructure to be able to expediently respond to the infrastructure needs. Important to ensure that any required upgrades and expansions to protected areas (such as Green Belt & Open Countryside) can be made to meet the infrastructure requirements of proposed future development in the region and future environmental drivers. The Environment Act 2021 places an obligation on sewerage undertakers</p> <p>England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. Policy wording for this & to provide wider</p>	

support for water and wastewater infrastructure investment that is beneficial to the environment, biodiversity, watercourses and growth is advocated.	
United Utilities - The Strategic Flood Risk Assessment will need to ensure it identifies any sites that are in a location that is at risk of flooding from a reservoir.	
Concerns at the pressures on existing infrastructure, such as highways, public transport & GP services. Individual development needs have not been fully assessed to understand that the relevant infrastructure is available to support them & that it could be viable for existing communities.	
Audley specific issues highlighted include parking difficulties given the narrow streets & traffic issues being exacerbated by the recently reduced public transport services to the village. Over-subscribed schools & at capacity doctors and dentists.	
Newchapel & Mow Cop specific issues (regarding Site Refs NC13 & NC77) include: –Infrastructure including sewage capacity, public transport (including the benefits of improved connectivity to Kidsgrove Railway Station), wider green infrastructure (including carbon capture), traffic & road network repercussions (such as at Pennyfields Road), plus over-subscribed doctors & primary schools. Proposals do not accord with Local Plan policies IN1, IN2 & SE1. Consider development at Talke Pits & only look to bring forward development in is locality once other options have been exhausted.	
Silverdale Parish - Site Allocations for SP11, SP12 and SP23 have considerable implications for infrastructure, and it is difficult to envisage development occurring without major improvements and new roundabouts	

63. FDLP Policy IN1: Infrastructure

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Recognise the need to secure the funding of infrastructure that is directly related in scale and kind, and which is necessary to make development acceptable in planning terms. However, it is noted that the local healthcare trusts often request contributions towards healthcare provision, however such contributions should be justified and transparent. On this point, the Council should consider recent case law in Worcestershire in formulating a policy for the provision of healthcare contributions and what such contributions should contribute towards, taking account of the statutory framework for funding NHS services. The Council's approach to securing healthcare contributions and what those contributions can be used for should be clearly set out in Local Plan policy so that it is clear and transparent to health care providers, developers, elected Members and residents.</p>	<p>The Final Draft Local Plan was informed by transport and infrastructure evidence including the Infrastructure Delivery Plan (ED003), with a Strategic Transport Assessment (ED011) also prepared to consider the allocations in the Plan and identify any mitigation measures required.</p> <p>Ongoing engagement with organisations such as Staffordshire County Council (who have responsibility for services such as education), National Highways & United Utilities has also informed the approach taken. The Water Cycle Study (ED014) & Strategic Flood Risk Assessment (ED013) are as well significant facets in the understanding of issues related to infrastructure.</p>
<p>Audley specific issues highlighted include: Road infrastructure is not suitable for an increase in local & commercial traffic; parking limited with location suggestions for increased provision – will there be measures to mitigate the extra demand?; further EV (Electric Vehicle) charging points required; public transport is very limited – will new development improve this?; greater waiting times & potentially reduced standards for medical services; provisions required from the local authority to reflect an increased population and help guard against issues such as anti-social behaviour worsening; provision for additional pensioner bungalows, the need for improved footpath & road maintenance; brownfield sites should be built on before Green Belt land; capacity at the Severn Trent water treatment plant off Alsager Road; adversely affect flood risk & climate change impacts (exacerbated by the geology of the area and the number of springs); capacity of existing services and where would any new school & medical facilities be located (with reference to para 20 of the NPPF & the proposals for TK30 & CT1)? – will this further impact the Green Belt?; the village needs high-speed broadband; will the electricity supply cope with serving the new dwellings?; appropriate access on to proposed</p>	<p>A wide range of both strategic & non-strategic policies (IN1-IN7) serve to set a positively prepared framework to support infrastructure related development, including those for community facilities, active travel, access & parking, utilities and for telecommunications. Consideration is also had to developer contributions and the role of on & off-site provisions being made.</p>

<p>residential sites is problematic; cumulative harm with areas such as Red St; harm to wildlife & historic hedgerows; increased pollution & air quality issues; recreational value of sites; who will be employed in AB2 – likely travel from further afield; availability of similar warehouse schemes nearby; low value jobs; amenity impacts with 24 hour operations; capacity of J16, M6 & scope for rat runs through the village; proposals driven by developer aspirations rather than a local need; warehousing unit development does not fit with the wider green agenda.</p>	
<p>Environment Agency - Welcome the detail within this policy that requires development to provide contributions towards or direct provision of flood prevention and surface water drainage. The need is highlighted for new development to contribute toward the upgrade and / or maintenance of existing flood prevention schemes where there is a direct / indirect benefit from these being in place. Financial contributions should also extend toward the running of flood warning and flood alert services.</p>	
<p>Keele & Silverdale specific issues highlighted include Doctor & teacher recruitment could be challenging, even if new facilities are developed. School place availability & getting medical appointments are also concerns. More investment would be required as a minimum, with it essential that the appropriate infrastructure is in place for any development to be successful. The large number of houses currently planned for the former Keele Golf Course and its environs will overload not only the existing transport infrastructure, but also utilities, education and health care. Flooding & nitrate issues. Silverdale has two main roads through the village –i.e. Mill Street/High Street and Newcastle Street/Church Street/Sneyd Terrace. The origins of these roads date from 1850s and have not been widened since and do not have the capacity for widening. The current retail area known as the Parade is already too small (with limited parking) & Silverdale itself is not large enough to cope with development of the scale proposed. What level of disruption can be expected during the building of houses and the necessary infrastructure?</p>	

<p>Transport planning is dependent on historic information covering the period from 2011 and other data for 2016. It is difficult to detect any meaningful comment that explains how infrastructure within the western wards of Keele, Thistleberry and Silverdale will be enhanced to facilitate the growth in population over 2020-40. The Infrastructure Baseline report (2021) mentions, for example, improvement to Silverdale Pumping Station, but for social infrastructure and physical infrastructure there is no detail at the district level. A direct assessment of the implications of the net allocations at Keele, University and Silverdale on traffic flows at A525 and B5368 during the current consultation might alleviate concerns about potential traffic congestion in the future.</p>	
<p>TB19 (Land South of Newcastle Golf Club): Kingsbridge Medical Practice states their own operational situation and the implications of potential development. It is asserted that the Council / Local Plan / Developer / ICB will need to provide full funding for the necessary expansion of the practice because of TB19 being developed. This includes equipment, furnishing and any associated expenses. Recruiting additional staff may be a challenge also. If support for expansion is not provided consideration would be given to moving their practice boundary to exclude the development.</p>	
<p>Loggerheads specific issues highlighted include Limited employment opportunities in the village means significant out-commuting; poor bus services; development in this locality does not align with the transport & accessibility policy of the Local Plan.</p>	
<p>With specific reference to Community Infrastructure Levy (CIL), it is asked that greater consideration is given to ensure that CIL contributions are properly applied to relevant planning applications. Based on the overall scale and scope of development which has taken place within Loggerheads Parish over recent years, what is the threshold for integrating improvements, enhancements and augmentations to infrastructure, amenities, and services? The reference to an existing Infrastructure Delivery Plan (IDP) is noted, but cannot see how this is relevant to Loggerheads Parish or where it has been applied?</p>	

Furthermore, there is not mention within this policy of plans to develop Retail Outlets, sports and recreation facilities, parks and play areas or car parking. A copy of the Infrastructure Delivery Plan, with specific reference to Loggerheads Parish, is requested as soon as practicable.	
This policy will in the future be an important consideration for proposals that could increase the use of facilities or affect assets, in particular parts 4 and 7. These elements of the policy should look to be retained within the final version.	
The document is silent on whether a Community Infrastructure Levy (CIL) is intended (or not intended) to be introduced. No reference is made to HS2 nor is its route reflected on the interactive map.	
Agree with the statement given in paragraph 11.3 that “good infrastructure planning is essential to achieving a high quality of development” and welcome the adoption of an Infrastructure Development Plan. The Local Plan should make it clear that developers will be expected to contribute to the cost of improving or replacing existing infrastructure and enforce the policy through Section 106 agreements.	
No mention of carbon or other emissions anywhere except in the supporting information, which is especially significant given the Council has declared a climate emergency.	
Policy IN 1 does not recognise the role that 100% affordable housing schemes make towards affordable housing provision. There is no scope currently to reduce the level of planning obligations for 100% affordable housing where viability is an issue. There needs to be greater policy direction to allow registered providers to reduce their planning obligations. Further policy criteria & guidance is explicitly highlighted as suggested amendments to address these issues.	
Greater clarity is needed on how the infrastructure pressures will be addressed in practice.	
The level of infrastructure work is needed be calculated before deciding on which sites are the most appropriate (both individually and combined	

when in one settlement/community)? This mismatch will impact on both the viability of any development and on the local community.	
Suggest that in paragraph 4 the reference to 'Health care provision' is linked to the Glossary definition of 'Infrastructure' and expanded upon (within the Glossary) to make clear that health provision extends beyond GP capacity. As of the 1 July 2022 the Staffordshire and Stoke-on-Trent ICS was established and formalised as a legal entity with statutory powers and responsibilities. Statutory ICSs are comprised of two key components: integrated care boards and integrated care partnerships. It should be noted that infrastructural requirements can span across the various partner services, such as primary care networks (including physical and digital infrastructural requirements) and therefore the term health should be understood in this context from both a policy and decision-making perspective.	
CT1 (Land at Red Street and High Carr Farm, Chesterton): Appropriate levels of infrastructure support for a development of the size proposed is going to be impossible, especially in school places and primary healthcare.	
Red Street, Chesterton, Bignall End, Talke and Bradwell specific issues highlighted include in addition to the problem of the full schools in the area, additional houses will place further strains on the other facilities such as doctors, Library and Community Centre. Additional houses will impact adversely on the road system & safety. The roads through the area have road calming measures installed, indicating an already present problem with traffic volume. Increased pollution made worse by removal of hedges and trees which promote Co2 absorption and reduce pollution levels. Concerns as pedestrians have not got access to footpaths and local buses no longer create a network to adjoin the villages.	
Historic England - Would welcome a reference to the historic environment within Clause 4 and how improvements to heritage assets, public realm improvements, local distinctiveness art and interpretation etc. would be beneficial to a local area.	

Whilst 4c mentions drainage, there needs to be a commitment to ensure that where major development sites link to existing drainage that may be inadequate that there is procedure which guarantees funding to improve the existing drainage system. Where relevant, inspection of current drainage will be necessary before planning permission is given for major new housing.	
Kidsgrove specific issues highlighted including making sure that suitable and satisfactory infrastructure is in place for any new housing or business sites, e.g. schools, health and medical services, public transport, well maintained roads, public services.	
Gladman support the policy's intention to secure developer contributions for infrastructure and facilities, subject to viability. Would also welcome an inclusion into the supporting text for negotiation regarding contributions when a development is rendered unviable by a proposed planning obligation. This ensures this policy is not restrictive and has an appropriate level of flexibility to allow sustainable development sites to come forward.	
United Utilities - Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. The full details of the development proposals are not yet known. For example, the detail of the drainage proposals or the water supply requirements. As a result, it is important to highlight that in the absence of such detail, it cannot be fully concluded the impact on infrastructure over a number of 5-year investment periods and therefore, as more detail becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure. Recommendation is made to include a development management policy with suggested wording to IN1 to this effect, as well as requiring applicants to provide drainage strategies for foul and surface water. For strategic sites, early consideration should be given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to delivery.	
Site specific comments to NC13 (Land West of	

<p>Bullockhouse Road, Harriseahead): Infrastructure including sewage capacity, public transport (including the benefits of improved connectivity to Kidsgrove Railway Station), wider green infrastructure (including carbon capture), traffic & road network repercussions (such as at Pennyfields Road). Proposals do not accord with Local Plan policies IN1, IN2 & SE1. Consider development at Talke Pits & only look to bring forward development in this locality once other options have been exhausted.</p>	
<p>Residents concern as to the potential impacts on traffic flows, construction congestion, inconvenience and noise, impact on local services and effects on the natural habitats for wildlife, when there is perceived to be no information to discuss. If site proposals had been provided that show plans for the development site illustrating road layouts, screening proposals, transport link proposals, Section 106 payments (which can be used for improving or preserving local amenities during and following development), actual school placement numbers and provisions to provide these places, alongside the projected increase in footfall to local shops, pubs / restaurants and facilities, then there would be a discussion on the finer points of a plan, less stress for locally affected residents, less stress for councillors faced with irate locals at any consultations and, most likely, a balanced and more contextually objective consultation. This complete contextual and transparent consultation outcome will also provide a comprehensive list of Developer Contributions for a site, or a collection of sites in any affected area, and where the money will be used, again minimising discussions and delays in pre-application advice as well as maintaining transparency and integrity for NULBC and other local authorities. Reference is also made to the perceived deficiencies and ambiguities of the Local Plan evidence base including the Infrastructure Delivery Plan. Implications of the residential & commercial development within Audley are difficult to discern especially for the communities affected. A lack of mitigation & abatement measures including those from the promoters of AB2. The site at AB2 has very limited potential for sustainable transport facilities as</p>	

no bus or train service will invest in new services until a demand has been identified and proven to meet their service provision criteria. The developer of any site should be mandated to provide this information to enhance the consultation with residents of the local area.	
Policy IN1 seems contradictory and not in line with expert thinking on energy efficiency or getting to grips with solutions. Making electricity an all-encompassing fuel resource might not be the answer, given the limitations and capacity of the National Grid. Using up reserve fossil fuels in the short-term is not a sustainable solution either. Until local and national authorities can come to grips with improving public transport, especially in rural areas, people will continue to use their cars.	
The housing shortage is a national problem, which every Council has an obligation to provide a solution to this crisis. The local plan should be robust and have a clear evidence-based indication of how it can provide the housing numbers as required. It may therefore be necessary, as an exceptional circumstance, to utilise part of the greenbelt to fulfil these obligations. Wider points regarding the purpose and review of Green Belt and its merits as a designation are also made. Those areas across the country that are actively farmed should be ring-fenced to protect the future of green spaces and farming industries and to protect the ability to produce the nation's own food sources.	
Natural England - Welcome the inclusion of green infrastructure and biodiversity net gain within this policy and advise that a link is also made to the Nature Recovery Network.	
Loggerheads Parish - With specific reference to Community Infrastructure Levy (CIL), Council asks that greater consideration is given to ensure that CIL contributions are properly applied to relevant planning applications.	
CPRE Staffordshire - The document appears to be silent on whether a Community Infrastructure Levy (CIL) is intended (or not intended) to be introduced.	

64. FDLP Policy IN2: Transport and Accessibility

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Audley specific issues highlighted include: Provision for additional pensioner bungalows, better village centre parking, the need for improved footpath maintenance, road safety (including for existing residents, pedestrians & cyclists on narrow highways such as Park Lane, Moat Lane and Barthomley Road) and capability to cope with increased traffic levels (what steps will be taken to mitigate this?) including wider accessibility to services & facilities impacts & concerns at reduced public transport availability. Construction traffic & large vehicle movements, (including at M6 & A500 junctions) if AB2 were to be developed. Doctor & dentists at capacity. Greater carbon footprint impacts, pollution, flood risk and climate change issues.</p>	<p>The Final Draft Local Plan was informed by transport and infrastructure evidence including the Infrastructure Delivery Plan (ED003), with a Strategic Transport Assessment (ED011) also prepared to consider the allocations in the Plan and identify any mitigation measures required. Ongoing engagement with organisations such as Staffordshire County Council (who have responsibility for services such as education), the NHS, National Highways & United Utilities has also informed the approach taken.</p>
<p>The emphasis on sustainable and active travel (walking and cycling) is welcomed. A particular concern, however, is over the need for better public transport in rural areas.</p>	<p>The Water Cycle Study (ED014) & Strategic Flood Risk Assessment (ED013) are as well significant facets in the understanding of issues related to infrastructure. A wide range of both strategic & non-strategic policies (IN1-IN7) serve to set a positively prepared framework to support infrastructure related development, including those for community facilities, active travel, access & parking – including the creation of car charging points, utilities, and for telecommunications. Consideration is also had to developer contributions and the role of on & off-site provisions being made.</p>
<p>Staffordshire Chambers of Commerce are developing a business case to open a new rail station on the West Coast Mainline at Etruria Valley, close to the new Etruria Valley Link Road, just to the east of the A500 and accessed off Lowfield Drive. The west side of the proposed station would sit inside the boundary of Newcastle under Lyme. We wish to identify this site as an opportunity for a transport hub and associated facilities within the Local Plan. Would welcome collaboration with Stoke with regards to infrastructure to maximise connectivity between North Staffordshire and the HS2 hub at Crewe.</p>	<p>Utilising travel plans & transport assessments to demonstrate that the safety, capacity and efficiency of the highway network will not be severely affected by development, and how the proposed development will link into and enhance existing or proposed walking, cycling or public transport infrastructure (e.g. bus services), is also advocated.</p>
<p>Loggerheads specific issues highlighted include Limited employment opportunities in the village mean significant out-commuting, with the distance to main centres such as Newcastle & Crewe making travel by car the only option. Very limited public transport options (both in scheduling and places it links to). Very limited local services that are easily accessible and, in many cases, require a car journey. S106 payments for granted planning applications remain outstanding in some cases (with it queried</p>	<p>The Rural Topic Paper ED005 sets out the analysis of services & facilities that exist within the rural centres and rural areas.</p>

as to what the Council will do to address this) and there has been no fresh infrastructure provided to satisfy increased demands from new development and is therefore contradictory to some aspects of this policy. Development in this locality does not align with the transport & accessibility policy of the Local Plan.	
Loggerheads Parish - Council requests detailed information as to how the abovementioned considerations can be retrospectively applied to Loggerheads Parish, and detailed information concerning how these can be implemented for the benefit of Loggerheads Parish going forward.	
With specific reference to LW53, support is given to the aim of this draft Policy, but it is again considered contradictory in terms of its selection as a preferred site and the proposal to expand Loggerheads further by building additional dwellings within the village. It is also pointed out that the draft Integrated Transport Strategy is focused exclusively on the urban core areas of Newcastle and Kidsgrove, has little if any reference to or relevance for rural communities, is now largely out of date (published 2015) and is of itself not consistent with the policy IN2 proposed in the draft plan.	
The Draft Plan proposes to place a significant number of houses in the surrounding locality of Red Street, Chesterton, Bignall End, Talke and Bradwell which all draw on the same road networks & this brings into question road safety (through the narrow roads, absence of pathways for pedestrians & exacerbated existing speeding vehicle issues) as well as flows of traffic onto the A500 & A34, and the limited public transport options.	
National Highways - The points set out in the policy are welcomed and acknowledgement is given that all developments likely to generate significant traffic will be accompanied by a Transport Assessment and a Travel Plan.	
The policy will be an important consideration for proposals that could increase the use of the Canal & River Trust's facilities or affect their assets, in particular parts 6 and 7. Accordingly, they would wish these	

elements of the policy to remain within the final version of the Local Plan.	
Advances in transport technology could influence the sustainability of sites going forward owing to reduced greenhouse gasses & pollution. This should be factored into consideration of development sites.	
The existing road network for commuters from the proposed site CT1 (Red St, Chesterton) is already saturated. The proposed development will simply add to existing congestion, pollution and the use of "rat runs" through surrounding urban areas.	
Position stated that there was nothing to object to in the Local Plan as far as it directly affected the Neighbourhood Plan area. Wider issues such as entry & exit routes to the Chatterley Valley distribution centre, traffic restrictions associated with the Bus gate, air quality management areas, development of sites in Talke, were all highlighted in terms of the desired avoidance of increased vehicle movements in May Bank, Bradwell & Wolstanton. Request also made for further clean air and pedestrian safety measures at Porthill and May Bank.	
Staffordshire Police - Suggested amendments to the policy (Section 4d) & supporting text (Para 11.12) to refer to secure parking for cycles, and safe cycle and footpaths with all routes necessary and serving a specific function or destination.	
Historic England - A clause should be inserted relating to the need to protect and enhance the significance of heritage assets including their setting and how this policy will address transport proposals which have the potential to affect the historic environment. There may also be opportunities through re-routing road networks away from heritage assets or walking and cycling initiatives that could better reveal the significance of heritage assets and these opportunities should be considered.	
HS2 services will feed into Crewe and the importance of employment development land being adequately served by public transport is highlighted. Reference is also made to the Chamber developing a business case to open a new rail station on the West Coast Mainline at	

<p>Etruria Valley, close to the new Etruria Valley Link Road & part of the Centre 500 development. The west side of the proposed station would sit inside the boundary of Newcastle under Lyme. It is also advocated that this site should be identified as an opportunity for a transport hub and associated facilities within the Local Plan. Collaborative working with Stoke City Council to maximise connectivity in North Staffordshire is suggested and reference made to Saved policies from the current development plan & a submitted site location plan in providing further context, background and argument.</p>	
<p>Once further evidence is provided and an assessment is made as part of the next iteration of the Habitats Regulations Assessment (HRA), changes may be required, as the approach to dealing with air quality impacts on European designated sites is progressed.</p>	
<p>Provision of bus services must be an explicit factor in the setting up of new houses & employment development. This should include requirements for some employers to provide or fund a small bus service</p>	
<p>Staffordshire County Council - The policy should place a greater emphasis on sustainability and ensuring that good active travel and public transport links and modes of transport are a priority when looking at new developments and strategic allocations. Various suggested amendments made to Points 1, 3 & 5 of IN2 for added clarity & minimising ambiguity in interpretation.</p>	
<p>Staffordshire and Stoke Integrated Care Board - Would like to suggest that in paragraph 4 the reference to 'Health care provision' is linked to the Glossary definition of 'Infrastructure' and expanded upon (within the Glossary) to make clear that health provision extends beyond GP capacity. To deliver the joined-up support required to meet the needs of the local population using primary care networks, it should be noted that infrastructural requirements can span across these partner services (including physical and digital infrastructural requirements) and therefore the term health should be understood in this context from both a policy and decision-making perspective.</p>	

Point 1a needs considerable clarification e.g. how will development be located to minimise travel if it is not co-located with employment, what is meant by sustainable modes of transport? Point 2 Keele Parish Council will read with interest any Transport and Travel Assessment plan for development on the former Golf Course (Site ref: SP11) and its environs, as it cannot be seen how the planned scale of development can be achieved without impacting on the safety, capacity, and efficiency of the local road network. The Integrated Transport Strategy and the Staffordshire Bus Service Improvement plan should be included in the evidence base for the Plan, as empirical evidence shows a declining rather than improving service. It would also be helpful if the Plan were to outline how the Borough and/or County propose to encourage more commuters to use the bus and what evidence they might have that such measures would be successful.	
Support for the draft wording of this policy, with it considered that the site of which they have an interest (Land off Birchenwood Way) making use of the existing pedestrian and cycling links on Birchenwood Way, which provide access to the nearby services and facilities in Kidsgrove.	
Whilst the stress placed throughout the draft Plan on the importance of using public transport is welcomed, the document does not pay sufficient attention to the challenge of using public transport	
Under the accessibility heading, the draft document does not refer to parking spaces being reserved for drivers with disabilities.	
The proposed site of NC13 would cause an unacceptable highway safety problem, including the T junction from High Lane to Pennyfields and Chapel Lane.	
Policy IN2 seems contradictory and not in line with expert thinking on energy efficiency or getting to grips with solutions. Making electricity an all-encompassing fuel resource might not be the answer, given the limitations and capacity of the National Grid. Using up reserve fossil fuels in the short-term is not a sustainable solution either.	

Request for detailed information as to how the various considerations highlighted can be retrospectively applied to Loggerheads Parish, and detailed information concerning how these can be implemented for the benefit of Loggerheads Parish going forward.	
Recent developments at Heritage Park, Silverdale, has increased traffic travelling through the village. The road surfaces are of poor quality with little maintenance. Local public transport is limited. Significant problems parking close to GP services, chemist and shopping facilities. Student numbers exacerbate parking problems. Emergency service vehicles at times are obstructed by the number of parked cars etc. Identification of land within the village for additional car parking facilities should be considered. Any development should include up grading the road system throughout the village.	
The council needs to complete a thorough transport assessment of the A500 near to junction 16.	
The promotion of sustainable transport options within Policy IN2 is welcomed. However, the policy could go further and include provision for a sustainable transport hub within the proximity of Keele University to provide a range of transport options to support movement to, from and within the University Growth Corridor. Plans should also take on board the need to create a more accessible and inclusive Public Transport Network, moving away from the East/West lineage of the existing system, and using the Local Plan to open up links to the North and South of Keele University, supporting more circular public transport solutions that link the Urban Villages to core employment sites and amenities, for example the Hospital, and the Keele Campus, ideally opening up public transport access between the A525 and the A53.	
This policy will in the future be an important consideration for proposals that affect the canal and rivers that could increase the use of our facilities or affect our assets, in particular parts 4 and 7. Response from Canal and Rivers Trust.	
Natural England - The Habitats Regulation Assessment (HRA) has identified that air pollution, in particular from traffic, could impact Habitat sites. The	

<p>next stage of the assessment will require further evidence. Once the evidence is provided and an assessment is made, changes may be required as the approach to dealing with air quality impacts on European designated sites is progressed</p>	
<p>Keele Parish - Point 1a needs considerable clarification, how will development be located to minimise travel if it is not co-located with employment, what is meant by sustainable modes of transport? Other than cycling or walking all transport uses some form of power/fuel. Are some considered more sustainable than others?</p> <p>Point 1f appears to be almost wishful thinking when large scale developments are planned, as most households now have 2 vehicles, and this is bound to have significant impact on existing road networks.</p> <p>Point 2 Keele Parish Council will read with interest any Transport and Travel Assessment plan for development on the former Golf Course and its environs, as we cannot see how the planned scale of development can be achieved without impacting on the safety, capacity, and efficiency of the local road network.</p> <p><i>From Newcastle's Integrated Transport strategy 2015: "In the AM peak the reliability of journeys into Newcastle Town Centre along A525 Keele Road has deteriorated from 14% to 24%"</i></p>	
<p>Bradwell, porthill, Maybank and Wolstanton Parish - The Local Plan discusses the importance of public transport yet offers no solutions to the very poor local transport.</p> <p>The Forum also wants to be reassured that the entrance and exit for the Chatterley Valley distribution centre can cope with the staff and vehicle movements. Additionally, the vehicle access arrangements for new sites at Talke on the A14 will not introduce more vehicles in to Brodwell Residential Area or the Wolstanton High Street.</p>	

65. FDLP Sustainable Environment

Summary of Main Issues Raised	How the main issues have been taken into account
More houses and warehouses should not be placed by villages as people move there for nature, safety, and child-rearing.	The council recognises the importance of creating a sustainable environment that balances development with the needs of communities and the natural world. The feedback received on the “Sustainable Environment” section of the Regulation 18 Local Plan has informed the development of policies in the Regulation 19 Local Plan, ensuring they reflect the community’s concerns and priorities.
Concerns as local infrastructure and services are already oversubscribed.	
Local transport needs to improve if residents are expected to reduce car use.	
<p>Clause 12.30. Golf courses should be excluded from this measurement. Golf is an elitist activity that is for private members and should not be counted or considered when calculating public services and green space.</p>	<p>Concerns about the impact of new housing and warehouses near villages, particularly regarding nature, safety, and child-rearing, have been carefully considered. Policy PSD2 'Settlement Hierarchy' guides the location of development, prioritising growth in the Strategic Centre and Urban Centre, which have the infrastructure and services to support larger-scale development. This helps to direct growth away from smaller settlements and minimise encroachment into the rural countryside. The plan also recognises the importance of protecting Green Belt land around villages to preserve their rural character and provide valuable green space for residents, as reflected in Policy PSD5 'Green Belt and Safeguarded Land'.</p> <p>The Plan also acknowledges concerns about the capacity of existing infrastructure and services. The Infrastructure Delivery Plan (ED003) identifies the infrastructure needed to support new development and outlines a collaborative approach to delivery. The plan also emphasises sustainable transport to reduce reliance on private cars and minimise impacts on air quality and the road network, as outlined in Policy IN2 'Transport and Accessibility'.</p> <p>To encourage reduced car use and promote sustainable modes of transport, the Plan supports a shift away from car dependency. Policy IN2 'Transport and Accessibility' prioritises walking, cycling, and public transport through requirements for new development to provide safe</p>

	<p>and accessible routes and connections, as well as contributions towards improvements to the public transport network. This aligns with the feedback calling for improved local transport.</p> <p>Regarding the comment about golf courses, the Plan recognises the importance of open space for recreation and amenity, but it does not consider golf courses as primary contributors to publicly accessible open space. Policy SE6 'Open Space, Sports and Leisure Provision' focuses on providing a diverse range of open spaces that are accessible and meet the needs of the community, regardless of income or membership status. The council has declared a climate emergency and is committed to addressing the challenges of climate change. The Regulation 19 version of the Local Plan is supported by a raft of evidence which has helped guide the council's policy positions in relation to Sustainability and Environmental issues.</p>
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66. FDLP Policy SE1: Pollution, Contamination and Amenity

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Environment Agency - Policy SE1 focuses on air quality, but it should equally prioritise protecting groundwater and improving water quality for human health and the environment. It is suggested that separate policies should be created to address specific issues like land contamination, air quality, and water quality, as the current policy headings lack clarity.</p>	<p>The council recognises the importance of a healthy and sustainable environment for the well-being of residents and the natural world. The feedback received on Policy SE1 'Pollution, Contamination and Amenity' in the Regulation 18 Local Plan has been carefully considered, and the Regulation 19 Local Plan now includes a strengthened policy framework and an updated evidence base to address the comments and concerns raised.</p> <p>Addressing the broad scope and lack of clarity:</p> <p>The Environment Agency recommended addressing specific issues related to land contamination, air quality, and water quality separately to improve clarity. In response, the Regulation 19 Local Plan now includes separate, more detailed policies:</p> <ul style="list-style-type: none"> • SE1 (Pollution and Air Quality): This policy focuses specifically on air quality, requiring new development to minimise air pollution. The policy encourages developments to reduce reliance on private cars by promoting sustainable transport methods such as walking, cycling, and public transport. Policy SE1 also supports the increased provision of electric vehicle charging infrastructure to reduce emissions from vehicles. Furthermore, the policy encourages the use of green infrastructure to help improve air quality. For example, the policy promotes planting trees and incorporating green spaces into new development. • SE2 (Land Contamination): This policy provides a comprehensive framework for assessing and remediating contaminated land. It requires a Preliminary Risk Assessment for all applications where land contamination is suspected and encourages the use of the National Quality Mark Scheme. The policy also mandates site investigations, risk assessments, remediation plans, and long-term monitoring to ensure contaminated land is appropriately managed.
<p>Environment Agency - If a development site has potential contamination of soils and groundwater, a Preliminary Risk Assessment is required for any planning application. Developers are advised to follow the Land Contamination Risk Management framework provided in LCRM.</p>	
<p>Environment Agency - Rep contains significant information regarding the Borough's Groundwater & contaminated land situation and history.</p>	
<p>Environment Agency - Consider using the National Quality Mark Scheme for Land Contamination Management to ensure that land contamination risks are appropriately managed. For more information, visit GOV.UK's contaminated land pages, and refer to publications on groundwater protection positions and protection zones (SPZs).</p>	
<p>Environment Agency - To assess risks to controlled waters from a site, refer to the Guiding principles for land contamination. Local authorities can advise on risks to other receptors, such as human health.</p>	
<p>Environment Agency - The following (taken from Wyre Forest DC local plan adopted 2022) is an example of clear and concise policy wording for your consideration. "Development proposals will not be permitted where the land is contaminated (*As defined under Part IIA of the Environmental Protection Act 1990) and not capable of appropriate remediation without compromising development viability or the delivery of sustainable development. For sites where land contamination is suspected, an adequate site investigation survey will need to be prepared (by a competent person) to demonstrate that land contamination issues have been fully addressed or can be addressed through the development".</p>	

Concerns that development at the Keele golf course could exasperate flooding and lead to contamination and pollution due to old mine workings.	<ul style="list-style-type: none"> • SE5 (Water Resources and Water Quality): This policy promotes the protection of water resources and the efficient use of water. It requires development to avoid unacceptable impacts on water quality and incorporates requirements for sustainable drainage systems. The policy also encourages developers to work with the Environment Agency and water companies to address potential constraints and capacity issues related to new development, such as those highlighted in the feedback regarding wastewater treatment capacity in Audley. • SE12 (Amenity): This policy specifically addresses the protection of amenity, ensuring new development safeguards residential amenity from various sources of potential harm, including noise, light pollution, odour, traffic, and inappropriate development. This aligns with the definition of "amenity" provided in the Plan Glossary (Chapter 16). The policy also incorporates the agent of change principle, placing responsibility on developers to mitigate any adverse impacts on existing amenities. <p>Addressing specific concerns:</p> <ul style="list-style-type: none"> • Land Contamination: Beyond the comprehensive approach laid out in Policy SE2, the Plan encourages the use of the National Quality Mark Scheme for Land Contamination Management to ensure that land contamination risks are appropriately managed. This demonstrates the council's commitment to utilising best practices and ensuring the long-term protection of human health and the environment. • Potential impacts on the Trent & Mersey Canal: Policy SE14 (Green and Blue Infrastructure) recognises the importance of the Trent & Mersey Canal as a vital element of the borough's green and blue infrastructure network. The policy includes provisions for protecting and enhancing the canal from potential
Concerns over increased air pollution due to new developments.	
Canal and Rivers Trust - The Trent & Mersey Canal, located in Kidsgrove Town Centre, is crucial for green and blue infrastructure in the borough. Its Green Flag status highlights the need for protection from development impacts, construction processes, and long-term effects like lighting and water discharges. Policy SE1 addresses these concerns, but there is a need to address the impact of invasive species	
Any development which would result in the loss or deterioration of irreplaceable habitats should be refused? If a habitat is irreplaceable, a compensation strategy would be little recompense.	
What is the definition of "significant"?	
Public transport must improve to make it a viable option. Services have recently been reduced.	
Proposed development especially AB2 will increase air light and noise pollution.	
It is unclear why "amenity" is included in the title, as the policy does not really address amenity.	
CT1 would significantly add to the levels of pollution and remove the "green lung effect provided by the existing land.	
Staffordshire Police - The benefits that external lighting can provide in relation to security and safety is welcomed, although it is recommended that the phraseology is improved. Currently it reads, "Ensure that any proposals where external lighting is required, a lighting scheme will be required for the security and to achieve working activities which are safe". The following would be a better alternative "Ensure that any proposals where external lighting is required, a lighting scheme will be required for security and to promote safe activity".	

Historic England - Under clause 1, we welcome the reference to the historic environment and would request that the wording relates to the significance of heritage assets through its setting. Rather than the current wording, the clause should relate to "heritage assets" rather than "historic buildings" to ensure all types of heritage assets are considered. It will also be relevant under other sections such as noise considerations. The policy should consider all contexts in which there could be an effect for the historic environment.	<div>development impacts, including those related to construction processes, lighting, and water discharges.</div> <ul style="list-style-type: none">• Loss or Deterioration of Irreplaceable Habitats: Policy SE8 provides strong protection for irreplaceable habitats, stating that "development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists." This ensures that these valuable and sensitive habitats are safeguarded from development.• Definition of "Significant": The Plan recognises that "significant" can be a subjective term. Chapter 4 of the Sustainability Appraisal outlines a hierarchy of assessment that is used to determine the significance of potential impacts on various environmental receptors. This criteria-based approach ensures consistency and transparency in evaluating the potential effects of development.• Public Transport: The Plan seeks to reduce car usage and encourage more sustainable forms of transport. For example, Policy IN2 'Transport and Accessibility' promotes walking, cycling, and public transport by requiring new developments to provide safe and accessible routes and connections to these modes of transport. It also requires contributions towards improvements to the public transport network.• Green Belt: The Plan recognises the value of Green Belt land in protecting the environment and limiting urban sprawl. Policy PSD5 'Green Belt and Safeguarded Land' ensures that Green Belt land is only released for development in exceptional circumstances, as justified by the plan.• Air Pollution: The Plan takes a proactive approach to reducing air pollution. Policy SE1 'Pollution and Air Quality' encourages developments to reduce reliance on private cars by promoting sustainable transport methods such as walking, cycling, and public transport. Policy SE1 also supports the increased provision
Natural England - We welcome this policy but advise that there may be occasions where individual developments will be unable to mitigate for their impacts and a more strategic approach will be more appropriate. For Habitat Sites for example Site Nitrogen Action Plan (SNAP) are sometimes used. Further information can be found here: https://publications.naturalengland.org.uk/publication/6140185886588928	
The opening statement of this section begs the question what level of mitigation would be acceptable, how would the measures be assessed and what type of pollutants will be acceptable?	
Point 1a questions if polluting emissions and odours will be known at development permission granted and if mitigation plans will be effectively implemented, without the Air Quality Action Plans mentioned in Point 1b.	
On Point 2c we would like to highlight that the development of the former Keele Golf Course will do anything but "protect and enhance ecosystems and the green infrastructure network to assist in the absorption of air pollutants"	
Baseline conditions need to be known to measure effectiveness of the policy.	
Silverdale Parish - Development planning on or near land affected by contamination of Walleys Quarry is a much greater issue than given space in the Draft	
Audley Parish - It is unclear why 'amenity' is included in the title, as the policy does not really address amenity. For site AB2, there would clearly be	

<p>difficulties in complying with this policy, due to impacts of light, noise and on-air quality</p>	
<p>Keele Parish - The opening statement of this section begs the question what level of mitigation would be acceptable, how would the measures be assessed and what type of pollutants will be acceptable?</p> <p>Point 1a raises the question of whether polluting emissions and odours will be known at the time of development permission being granted, and whether the proposed mitigation will be effectively implemented e.g. Walley's Quarry.</p> <p>Without the Air Quality Action Plans referred to in Point 1b it is impossible to comment on this.</p> <p>The comments on Point 2 of IN2 apply here with regard to transport, but on Point 2c we would like to highlight that the development of the former Keele Golf Course will do anything but:</p> <p>"Protect and enhance ecosystems and the green infrastructure network to assist in the absorption of air pollutants"</p>	<p>of electric vehicle charging infrastructure to reduce emissions from vehicles. Furthermore, the policy encourages the use of green infrastructure to help improve air quality. For example, the policy promotes planting trees and incorporating green spaces into new development.</p> <ul style="list-style-type: none"> • "Amenity" in Policy Title: "Amenity" is included in the title of Policy SE12 because the policy directly addresses the protection of residential amenity from various sources of potential harm. The policy seeks to mitigate negative impacts such as overlooking, loss of privacy, overshadowing, and excessive noise or disturbance from development, ensuring that new development does not harm the quality of life for existing residents.
<p>Bradwell, Porthill, Maybank and Wolstanton Parish - Porthill, Wolstanton and May Bank were designated one of 5 Air Quality Management Areas in the Borough in 2018. The Forum would like to arrange a meeting with the Council's Environmental Health officer and Highways to discuss the latest readings and the need for further clean air and pedestrian safety measures at Porthill and May Bank.</p>	<ul style="list-style-type: none"> • Development at the Keele Golf Course: Concerns regarding flooding and contamination risks at the Keele golf course site are addressed through a combination of policies and technical assessments. Policy SE2 requires site investigations and remediation measures for potentially contaminated land, specifically considering the potential for flood events to exacerbate contamination risks. Policy SE3 mandates Flood Risk Assessments for all development proposals meeting specified criteria, ensuring that any flood risks, including those related to previous land uses, are identified and mitigated. Additionally, the Water Cycle Study (ED014) assessed the capacity of existing infrastructure and the potential for contamination related to the site's former use as a golf course. • Cumulative Impacts: The Plan recognises that development can have cumulative impacts on the environment. Policy SE1, for example, requires consideration of the cumulative effects of emissions from proposed development alongside other existing sources of air pollution. The plan also employs a strategic approach to flood risk management, water resource allocation, and biodiversity net gain, considering the combined effects of

	individual development proposals on the borough's overall environment.
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67. FDL Policy SE2: Flood Risk, Water Resources and Management

Summary of Main Issues Raised	How the main issues have been taken into account
Concerns over the impact of new development on flood risk and increased surface water flooding. Issues already exist in some areas.	<p>The council acknowledges concerns raised during the Regulation 18 consultation regarding the impact of new development on flood risk and increased surface water flooding. These concerns have been carefully considered, and the Regulation 19 Local Plan now includes a strengthened policy framework, aligned with the updated Strategic Flood Risk Assessment (2024), to address those concerns and provide a more robust and transparent approach to managing flood risk.</p> <p>Responding to Feedback and Enhancing Clarity:</p> <p>In response to the Environment Agency's recommendation to create separate policies for flood risk management and sustainable drainage, the Regulation 19 Plan has been restructured to provide clearer and more focused policies:</p> <ul style="list-style-type: none"> • SE3 (Flood Risk Management): This policy specifically addresses flood risk from all sources, including fluvial, surface water, groundwater, and sewer flooding. It mandates Flood Risk Assessments (FRAs) for developments meeting specific criteria, including those in Flood Zones 2, 3, or 3b, as well as certain sites in Flood Zone 1. The policy requires FRAs to be informed by the latest SFRA (2024), ensuring consideration of the most up-to-date flood risk information. Additionally, SE3 incorporates climate change allowances for peak river flow and rainfall, as well as groundwater assessments in susceptible areas, as recommended by the Environment Agency. • SE4 (Sustainable Drainage Systems): This policy focuses specifically on the implementation of SuDS. It requires development proposals to submit a drainage strategy that prioritises infiltration and incorporates the surface water hierarchy, aligning with the latest SFRA recommendations. It also emphasises early engagement with the Lead Local Flood
Environment Agency - The heading for this policy duplicates elements of Policy SE3 (Water resources). It may be clearer to have separate policies for Flood Risk Management and for Sustainable Drainage.	
Environment Agency - The policy is quite long and seems to duplicate some parts of the NPPF and NPPG guidance. It should have more regard to and focus on specific local Newcastle Under Lyme flood risk requirements linked to your Strategic Flood Risk Assessment (SFRA).	
Environment Agency - The SFRA identifies Lyme Brook as the primary fluvial flood risk in Newcastle Under Lyme, affecting the town centre, including Brook Lane and the Poolfields area, Silverdale, Knutton, Cross Heath, and Clayton. The SFRA identifies some areas as high risk (cumulative impact assessment) Lyme Brook catchment, with some recommendations. You should consider including the SFRA recommendations into your policy.	
Environment Agency - Easement: Recommendation C of the 2019 Level 1 SFRA mandates a minimum 8m development easement near main rivers for essential maintenance access. This requirement applies regardless of floodplain extent. An Environmental Permit is required for development within this 8m strip. If the site is above a culverted main river watercourse, an 8m easement is required, and the area above the culvert is considered a no-build zone.	
Environment Agency - Culverts: Section 4.9.4 of the 2019 level 1 SFRA mandates development efforts to naturalise urban watercourses by reinstating natural channels and restoring floodplains. This will improve biodiversity net gain, amenity, and reduce flood risk. River Basin Management Plans provide detailed information on de-culverting and creating naturalised watercourses.	

<p>Environment Agency - Floodplain compensation: The current section should require the compensation to be level for level and volume for volume. Alternative text below: In accordance with the Level 1 SFRA (10.2.1) applicant must provide level-for-level and volume for volume floodplain compensation, up to the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change. Level for Level and volume-for-volume compensation must be undertaken where requested unless a justified reason has been submitted and agreed upon, which may justify other forms of compensation.</p>	<p>Authority (LLFA) and United Utilities (UU) to explore feasibility and design, recognising the importance of collaboration in implementing sustainable drainage.</p> <p>By splitting the former Policy SE2 into two distinct policies, the Council has created a more comprehensive and user-friendly framework for managing flood risk and implementing sustainable drainage.</p> <p>Incorporating Specific Recommendations and Addressing Concerns:</p> <p>The Regulation 19 Plan incorporates several specific recommendations from the Environment Agency and United Utilities, demonstrating a commitment to following best practices and addressing the unique flood risks in the borough:</p> <ul style="list-style-type: none"> • Lyme Brook: The SFRA identified Lyme Brook as the primary fluvial flood risk in Newcastle-under-Lyme, affecting the town centre and other areas. Policy SE3 requires all development proposals in areas at risk of fluvial flooding to be informed by the SFRA and to ensure that development does not increase flood risk on-site or off-site. This approach will help to guide development away from high-risk areas and protect both existing and future development from flooding. • Surface Water Flooding: Recognising that surface water flooding poses a significant risk, Policy SE4 requires new development to incorporate sustainable drainage systems (SuDS) to manage surface water runoff sustainably. The policy promotes a comprehensive approach to SuDS, encouraging the use of a variety of techniques, including infiltration, attenuated discharge, and the use of clean roof runoff. This approach is aligned with recommendations from the Environment Agency and United Utilities and aims to mimic natural drainage patterns, reduce the risk of surface water flooding, and enhance the water quality of the borough's watercourses. • Easement: Policy SE3 incorporates the 8m development easement recommendation for main rivers, ensuring essential
<p>Environment Agency - Modelling: While detailed modelling is a preferred option, we would only normally seek that on major development proposals (for both Main and Ordinary watercourses).</p>	
<p>Environment Agency - Climate Change: Policy text should include an updated allowance for climate change in FRAs, referencing the Gov.uk peak river flow map and climate change allowances.</p> <p>Your surface water section could also link to climate change peak rainfall allowances.</p> <p>Point 2b of the policy is confusing and should be split out to differentiate surface water from fluvial climate change design allowances.</p>	
<p>Environment Agency - Finished Floor Levels: The SFRA advises that as a minimum finished floor levels should be set 600mm above the 1 in 100 years plus climate change (design flood). These could be incorporated into policy.</p>	
<p>Environment Agency - Flood Defence Schemes: The following schemes are under investigation in the area and development contributions are being sought to secure funding for these initiatives.</p> <ul style="list-style-type: none"> • Lyme Brook FRMS Newcastle under Lyme - Environment Agency. • Newcastle under Lyme Drainage Routes Strategy - Staffordshire County Council. <p>The policy should ensure that all development benefiting from flood warning services and flood defences contributes financially to the flood warning service and/or flood defence maintenance. A link to Policy IN 1: Infrastructure could be made. Examples of flood risk management in</p>	

<p>adopted Local Plans can be found e.g. Wyre Forest DC Policy SP.31 – Flood Risk Management.</p>	<p>maintenance access and reducing the risk of development encroachment into the floodplain.</p> <ul style="list-style-type: none"> • Culverts: The Plan encourages efforts to naturalise urban watercourses by reinstating natural channels and restoring floodplains, where appropriate. This approach, aligned with the recommendations of the SFRA, will improve biodiversity net gain, enhance amenity, and reduce flood risk. • Floodplain Compensation: Policy SE3 requires level-for-level and volume-for-volume floodplain compensation, aligning with the recommendations of the SFRA and ensuring that any loss of floodplain is adequately compensated. • Climate Change: Policy SE3 requires FRAs to include an updated allowance for climate change, referencing the Gov.uk peak river flow map and climate change allowances. This ensures that new development is designed to be resilient to the projected impacts of climate change. The surface water section of Policy SE4 also links to climate change peak rainfall allowances, ensuring that sustainable drainage systems are designed to handle more intense rainfall events. • Finished Floor Levels: Policy SE3 recommends that finished floor levels be set at a minimum of 600mm above the 1 in 100 years plus climate change (design) flood level, as advised in the SFRA. • Flood Defence Schemes: Policy SE3 encourages development that benefits from flood warning services and flood defences to contribute financially to their maintenance, as recommended by the Environment Agency. This helps to ensure that these vital systems are adequately funded. <p>Additionally, the plan recognises the need for a holistic approach to water management that considers the interconnectedness of flood risk, water quality, and biodiversity. Policy SE5 'Water Resources and Water Quality' reinforces the Plan's commitment to sustainable water management, encouraging water efficiency, water reuse, and the protection of water resources. The Regulation 19 Plan also specifically</p>
<p>Sustainable Drainage - We would look for a commitment for clean roof runoff to be directed away from the sewer system and into infiltration drainage or other SuDS system.</p> <p>We consider any infiltration Sustainable Drainage System (SuDS) greater than 2.0 m below ground level to be a deep system and are not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. All need to meet the criteria set out here: Groundwater protection position statements - GOV.UK (www.gov.uk).</p> <p>SuDS attenuation basins should normally be located outside of the 1% annual probability fluvial, with climate change, floodplain to avoid operational issues. (e.g. from the system flooding out during a flood event).</p> <p>Environment Agency - You may wish to also consider rural Suds and sedimentation control - to help meet Water Framework Directive objectives please see Rural Sustainable Drainage Systems.</p>	
<p>Historic England - We would welcome the Council considering how the historic environment can be safeguarded within this policy and protection included to ensure that flood alleviation measures do not have a negative effect for the historic environment for example through issues such as waterlogged archaeology.</p>	
<p>Natural England - We welcome this policy but advise that there may be occasions where individual developments will be unable to mitigate for their impacts and a more strategic approach will be more appropriate. For Habitat Sites for example Site Nitrogen Action Plan (SNAP) are sometimes used. Further information can be found here.</p>	
<p>United Utilities - UUW supports Policy SE2's current approach but recommends addressing flood risk and surface water management separately. A separate planning policy for each matter would provide a clear process for new development regarding surface water management.</p>	

<p>United Utilities - We recommend that policy SE2 requires applicants to submit a foul and surface water drainage strategy We wish to recommend the following wording for inclusion as policy in any future local plan: <i>"All applications must be supported by a strategy for foul and surface water management. Surface water should be discharged in the following order of priority:</i></p> <p><i>i. An adequate soakaway or some other form of infiltration system....."</i></p> <p>[The rep continues to provide more extensive policy and justification text for consideration]</p>	<p>addresses the need to consider all forms of flood risk, including sewer flooding, in line with United Utilities' recommendations. Policy SE3 now explicitly states that Flood Risk Assessments must consider the "risk of flooding from any source," and that "applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs." This ensures that sewer flooding risks are identified and mitigated as part of the development process.</p>
<p>United Utilities - Flood Risk - UUW emphasises the importance of addressing all forms of flood risk in local plans, approving the current policy wording in Policy SE2. the following additional policy wording / explanatory text is recommended for inclusion as part of Policy SE2:</p> <p><i>"3. Sewer Flood Risk. The risk of flooding from any source must be considered. Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs...</i> [The rep continues to provide more extensive policy and justification text for consideration].</p>	<p>The Plan's policies on flood risk and sustainable drainage are informed by up-to-date and relevant evidence, including the River Basin Management Plans, ensuring consistency with regional and national best practices.</p>
<p>United Utilities - On-site Flood Risk: New development sites should consider existing public sewers at risk of flooding and previous flooding records. Site allocations could be affected by overland flow from public sewers. Early consideration of flood risk in design and development is crucial, ensuring no flood risk is displaced. Our initial assessment of sites identifies:</p> <ul style="list-style-type: none"> - Sites with an on-site modelled flood risk; - Sites with a record of on-site sewer flooding; and - Sites with a record of sewer flooding in the vicinity of the site. <p>Additional policy wording is suggested for each site allocated which is affected by sewer flood risk.</p>	
<p>United Utilities - We are particularly concerned by site reference BL24. Our modelling data identifies a level of flood risk. In the absence of information which confirms that this site is developable either in whole or part, we must register an objection to the allocation of this site.</p>	

<p>United Utilities - Reservoir Flooding: Newcastle-under-Lyme has multiple reservoirs with distinct flooding zones, indicating the extent of potential floodwater spread in the event of a reservoir failure.</p> <p>The Strategic Flood Risk Assessment should identify sites at risk of flooding from reservoirs and include them in site-specific comments in Chapter 15.</p>	
<p>Foul Water and Surface Water - UUW suggests that policy SE2 requires all applications to provide clear evidence of the thorough investigation of the surface water management hierarchy to prevent increased flood risk elsewhere.</p>	
<p>Point 2: Recent record levels of rainfall and flooding suggest that with the changing weather patterns resulting from Climate Change a 1% annual probability of flood does not seem realistic.</p>	
<p>Point 4: Keele Parish Council is concerned re Suds for large scale development projects. For these we consider a hydro-geological study should be undertaken, especially when there will be significant destruction of mature trees, that absorb significant amounts of ground water.</p>	
<p>New housing developments should be strategically located along major routes like the A34 to efficiently manage sewage, rather than in rural areas.</p>	
<p>Keele Parish - Point 2: Recent record levels of rainfall and flooding suggest that with the changing weather patterns resulting from Climate Change a 1% annual probability of flood does not seem realistic.</p> <p>Point 4: Keele Parish Council is concerned re Sustainable Drainage Systems for large scale development projects. For these we consider a hydro-geological study should be undertaken, especially when there will be significant destruction of mature trees, that absorb significant amounts of ground water.</p>	

68. FDL Policy SE3: Water Resources and Water Quality

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Environment Agency - Water stress: The Water Cycle Study dated 2020 indicates a moderate stress on water resources within the Borough but suggests that the proposed growth can be managed without resulting in water resource capacity issues.</p> <p>The latest report into Water Stressed Areas (July 2021) indicates the Severn Trent Area to now experience serious water stress. We recommend that further assessment be made to ensure capacity to support the proposed growth. Water stressed areas – 2021 classification - GOV.UK</p> <p>Your policy needs an update to reflect the above.</p>	<p>The Plan addresses the comments and recommendations regarding water resources and water quality through updated evidence and strengthened policy wording within Policy SE5.</p> <p>Responding to concerns about water stress and the need for updated assessment, the council commissioned an updated Water Cycle Study (2024) (ED014). This study, which supersedes the 2020 version, provides the latest assessment of water resource capacity, identifies any necessary mitigation measures, and assesses wastewater infrastructure capacity. The updated study informed the development of Policy SE5, which addresses the Environment Agency's concerns about water stress by reinforcing the commitment to sustainable water management. It explicitly references the 110 litres per person per day standard for new residential development, as recommended.</p>
<p>Environment Agency - Wastewater infrastructure: Your water cycle study should ensure that your strategic growth can be accommodated in consideration of wastewater infrastructure. To address a constraint in a development, it is crucial to show a solution, whether it is already programmed or a future infrastructure upgrade.</p> <p>WSC recommends a Phase 2 Water Cycle Study for water quality impact assessment, which is not yet part of the Local Plan evidence base, to ensure site appropriateness and deliverability.</p>	<p>The Water Cycle Study (ED014) also directly addresses the Environment Agency's concerns about wastewater infrastructure. The study includes a thorough assessment of the capacity of wastewater treatment works to accommodate strategic growth, focusing on local treatment works' ability to accommodate housing and employment growth, and addressing physical capacity issues and environmental capacity issues.</p>
<p>Environment Agency - The EA supports the inclusion of water efficiency standards in Policy CRE 1: Climate change and the tighter requirement for new residential developments to achieve a maximum usage of 110 litres pppd, but suggests it could be better placed within SE3.</p> <p>The tighter water efficiency standards can be justified with reference to the following guidance.</p> <p>Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:</p> <p>-The Environment Agency publication Water Stressed Areas final classification 2021 -</p> <p>We encourage you to also include policy requirements for grey water recycling and rainwater harvesting for new developments</p>	<p>Whilst the water efficiency standards are currently included in Policy CRE1 (Climate Change), the Regulation 19 Plan reinforces this commitment to sustainable water management within Policy SE5. The policy explicitly references the 110 litres per person per day standard and encourages the incorporation of water reuse strategies, such as greywater recycling and rainwater harvesting, where feasible, directly addressing the Environment Agency's recommendations.</p>

Environment Agency -Waste water infrastructure -The water cycle study should consider wastewater infrastructure's capacity to accommodate strategic growth, focusing on local treatment works' ability to accommodate housing and employment growth, addressing physical capacity issues and environmental capacity issues.	<p>Policy SE5 now explicitly references the Water Framework Directive (WFD) and requires development proposals to demonstrate their contribution towards achieving 'good ecological status' for water bodies in the borough, responding to the concerns about the Lyme Brook and River Lea. The policy also incorporates the EA's suggested wording regarding non-mains foul drainage, ensuring consistency with national guidance.</p> <p>The Plan's supporting documentation now includes information on specific WFD catchments, addressing the Environment Agency's suggestion to provide more detailed information on this topic. Recognising the importance of safeguarding groundwater, Policy SE5 incorporates recommendations regarding Groundwater Source Protection Zones (SPZs), requiring a comprehensive risk assessment for development within these zones. The policy also requires an assessment of potential impacts on water supply resources for development proposals on water catchment land, addressing the concerns raised by United Utilities.</p> <p>The council acknowledges the concerns about development near wastewater treatment works and encourages locating development away from these areas in line with the NPPF and the agent of change principle.</p> <p>Policy SE5 also addresses concerns regarding nitrate neutrality, requiring development proposals in designated zones or near sensitive water bodies to demonstrate they will not increase nitrate levels. Through these revisions, the council has sought to ensure that new development is sensitive to water resources, contributes to improving water quality, and supports the long-term sustainability of the water environment in the borough.</p>
Environment Agency - Water Framework Directive: The Lyme Brook and River Lea, the main rivers affecting the Borough, have poor ecological status. The goal is to achieve 'good ecological status' by 2027, Policy should require development to improve waterbodies' ecological status. Suggested wording provided in the full representation.	
Environment Agency - Supporting Information: Section 12.19 /12.20 – We recommend your plan includes a section on where to find information on specific areas / catchments. Details of the WFD catchment can be found in rep.	
Environment Agency - Non-mains foul drainage: Suggest including text regarding non-mains foul drainage E.g. <i>“Development should follow the hierarchy (order of preference for foul drainage connection), as set out in the National Planning Practice Guidance. The Council requires non mains drainage proposals to assess the potential impacts upon water quality to ensure no detrimental impact on the water environment”</i> . (Wyre Forest adopted local plan).	
United Utilities - Groundwater Source Protection Zones: The Environment Agency has established Groundwater Source Protection Zones (SPZs) for groundwater sources, which are crucial for public drinking water supply. These zones indicate areas with risks from activities on or below the land surface, such as construction. The Uuw strongly prefers development sites to be located away from sensitive groundwater protection areas, such as SPZ1. Clear policy wording is essential to mitigate the effects of development on groundwater environment and public water supply. Uuw welcomes policy SE3: Water Resources and Water Quality but suggests additional wording could be included. [SEE REP FOR WORDING]	

United Utilities - Water Catchment Land: UUW recommends a policy identifying the need to engage with the statutory undertaker for water to determine if development proposals on water catchment land affect water supply resources. For wind energy proposals on water catchment land, applicants should locate development to minimise impact on public water supply through location, risk assessments, and mitigation measures. It is crucial to avoid new wind turbines on deep peat land and ensure that the statutory undertaker is informed about the location of catchment land in the borough. [REP INCLUDES SUGGESTED POLICY WORDING].	
United Utilities - Development next to Wastewater Treatment Works and Pumping Stations: UUW advocates for the identification of new sites, particularly housing, that are not near wastewater treatment works, in line with the NPPF. [ADDITIONAL POLICY WORDING IN REP].	
United Utilities - We wish to highlight that site BL3 (UNPREFFERED) is within proximity of Kidsgrove WwTW.	
Keele Parish - concerned that there is no explicit mention of nitrates and nitrate neutrality in this section	

69. FDLP Policy SE4: Open Space, Sports and Leisure Provision

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Canal and Rivers Trust - The plan includes our network as open space, aligning with the borough's Vision and Strategic Objectives. Our canals support community health and wellbeing, and we consider parts 1 and 2 of policy SE4 important in future proposals. Cross border connectivity should not be overlooked in our network.</p>	<p>The council recognises the vital role that open space, sports, and leisure facilities play in creating healthy, vibrant, and sustainable communities. The feedback received during the Regulation 18 consultation on Policy SE4 'Open Space, Sports, and Leisure Provision' has been carefully considered, and the Regulation 19 Local Plan now includes strengthened policy wording and an updated evidence base to reflect those concerns and priorities.</p> <p>Responding to Feedback and Enhancing the Policy:</p> <ul style="list-style-type: none"> • Scope of Policy: In line with Sport England's recommendation, Policy SE6 now explicitly applies to "open space, sports and recreational buildings and land, including playing fields," emphasising that it covers a full range of facilities and their associated land. This ensures the policy addresses the full spectrum of provision, including playing fields that may not have been fully captured in previous assessments. • Playing Pitch Strategy: The policy explicitly references the Council's updated Playing Pitch Strategy (2024) (ED012a), acknowledging that the initial strategy (2020) did not assess all playing fields in the borough. The updated strategy takes a comprehensive approach, considering both quantitative and qualitative factors and aligning with Sport England's guidance. It also acknowledges the potential for off-site contributions to enhance existing facilities, addressing the need for flexibility. • Quality of Provision: To address concerns about the quality of new open space and facilities, the Regulation 19 Plan now incorporates considerations for the quality of provision within Policy SE6. The policy references the updated Playing Pitch Strategy (2024), which found that numerous football pitches across the borough were assessed as being of "poor" quality and required upgrades. This focus on quality will ensure that new provision is not only adequate in quantity but also meets the
<p>Sport England - Sport England welcomes reference to the Council's Playing Pitch Strategy (PPS) and Sport Pitch Calculator to help direct sports provision or contributions towards. However, it is vital that the Council should ensure that the PPS has been kept up to date, in line with Sport England's Playing Pitch Strategy Guidance</p> <p>The policy would be strengthened / be more effective by ensuring that policy states that it relates to open space, sports and recreational buildings and land, including playing fields.</p> <p>It should be noted that not all playing field sites (including lapsed and disused) were captured in the PPS</p>	
<p>The policy is clearly explained apart from point D which is more ambiguous. For example, how would an objective assessment of the quality of any alternative provision be undertaken?</p>	
<p>We hope that the open space off Hoon Avenue, known locally as "Balls/Baldy's Field" will be designated as open land which cannot be developed. This site is ancient farmland and of considerable historic significance.</p>	
<p>Concerns that any major development includes provision of high-quality recreational space.</p>	
<p>Our client has no objection to draft Policy SE 4. 14.2. It is noted that this draft policy emphasises the importance of, and requires, new developments to provide sufficient open space. Therefore, housing allocations in the Local Plan must include sufficient land for open space, it is submitted that some of the land in our client's ownership lends itself to inclusion in the relevant adjoining housing allocations (TK10 and TK27), as open space.</p>	

As off-site open space contributions can often be an issue for affordable housing viability on 100% affordable housing schemes, it is suggested that 100% affordable housing schemes are excluded from this requirement of Policy SE 4.	<p>quality standards required for a functional and enjoyable public realm. Furthermore, the Plan ensures that design considerations, including those outlined in Policy PSD7 'Design,' are incorporated into the planning and delivery of open space, sports, and leisure facilities.</p> <ul style="list-style-type: none"> • Canal and River Trust Network: The plan recognises the value of the Canal and River Trust's network as part of the borough's open space provision. Policies SE6 and SE14 (Green and Blue Infrastructure) include provisions for protecting and enhancing this network, aligning with the borough's Vision and Strategic Objectives. • Community Involvement: The council is committed to a collaborative approach to open space provision. Policy SE6 emphasises engagement with stakeholders and the community and clarifies that appropriate consultation will be utilised to gather community input on proposals affecting existing open spaces. This commitment will help ensure that development proposals are sensitive to the needs and priorities of local communities. <p>Addressing Specific Points and Concerns:</p> <ul style="list-style-type: none"> • Highway Safety: The policy acknowledges Staffordshire County Council's highway safety concerns by stating that open space provision will be determined on a site-by-site basis, considering location, type, and scale. This ensures the location of new sports and leisure facilities is carefully assessed in relation to highway and pedestrian safety. • Flexibility for Off-Site Contributions: The plan incorporates flexibility for off-site contributions towards enhancing existing facilities for "Provision for Children and Teenagers", where on-site provision may not be feasible. These contributions will be assessed in relation to existing facility capacity, accessibility, and community needs. The use of off-site contributions will provide
The policy should be expanded to address the quality of new facilities and open space provision in development, considering the National Design Guide and current facilities. It should be stronger on protecting facilities in rural areas and settlements.	
Staffordshire County Council - The appropriate location of Sports and Leisure facilities in proximity to the public highway will need to be fully considered and mitigating measures put in place to preserve the safety of the local highway network.	
Specifically on point 2 we would like to see published the criteria that will be used to assess applications and would hope to see that the views of the local community would also be sought, as they are the users of the space.	
The principle of accommodating open space requirements on site for major developments is agreed as part of good design. However, for elements such as provision for children and teenagers, the ability to contribute towards the expansion or improvement of a suitable existing facility should be included within the policy to allow for flexibility.	
The table lists guideline amounts of land per 1000 persons. These values should be increased to encourage Newcastle Under Lyme to be an area renowned for both green space, parks and leisure space which are well maintained.	
If the Council decide to set a minimum size for residential outdoor amenity open space, sports and leisure provision, there should be an exemption for older people's housing schemes so long as high-quality amenity space suitable for older people is provided on site".	
The Council should clarify off-site contributions for neighbourhood-wide facilities, using Sport England Facility Cost Guidance or similar guidance. It should also specify if maintenance costs for the first five years should	

<p>be included, providing developers with greater certainty about the contributions they are likely to be sought.</p>	<p>developers with greater flexibility whilst ensuring that open space provision remains adequate to meet the needs of the community.</p> <ul style="list-style-type: none"> • Exemptions for Older People's Housing: The policy clarifies that guideline amounts of open space per 1,000 people are a guide, allowing departures based on site-specific factors and quality of provision. Exemptions may be granted for older people's housing schemes, as long as appropriate on-site amenity space is provided, addressing the specific feedback point regarding this. • Off-Site Contributions and Costs: The council will clarify its approach to off-site contributions for neighbourhood-wide facilities, considering Sport England Facility Cost Guidance or similar guidance. The council will also consider the inclusion of maintenance costs for the first five years to provide greater certainty for developers. • Neighbourhood Plan Alignment: The council recognises the importance of aligning the Plan with existing Neighbourhood Plans, particularly for Local Green Space designations. Where these designations exist, Policy SE6 requires development proposals to protect and enhance them, ensuring consistency between local and borough-wide planning. <p>The Regulation 19 Plan aims to ensure that sufficient open space, sports, and leisure provision is available to meet the needs of residents, enhancing the quality of life and promoting healthy, active lifestyles. The plan is informed by the Open Space and Green Infrastructure Strategy, the Playing Pitch Strategy, and other relevant evidence, ensuring that the council's approach is robust, comprehensive, and aligned with national policy and best practices.</p>
<p>Loggerheads Parish Council note that the Draft Local Plan has made no effort to follow these existing designations within existing Neighbourhood Plans:</p> <p>'LVV, which is known as 'Land off Market Drayton Road / The Burntwood Community Area is presently subject to legal discussions between the Parish and Borough Councils with respect to its ongoing future, and the intention to have community-based amenities and facilities on the site. 1V2' is privately owned land, which is designated as open space, with the only other acceptable use being for sports recreation facilities. Council requests the next iteration of the Draft Local Plan demonstrates an emphasis on echoing existing Neighbourhood Plans, many of which have been in place a lot longer than any Boroughwide Local Plan. There needs to be a longer-term plan for locations and infrastructure, and not a piecemeal approach on a site-by-site basis.</p> <p>SO-IX seeks to support the creation, inclusion and enhancement of sports and recreation facilities. The Playing Pitch Strategy and Action Plan, December 2020, stated that the support of strategic partners and key stakeholders would be given to assist the Parish Council in developing a 3g pitch facility. To date, this has not happened.</p>	
<p>Audley Parish - APC would like to see the policy expanded to deal with the quality of provision of new facilities and open space in development. The policy would allow for loss of sports facilities where benefits outweigh loss. This could allow very harmful and unsustainable development, especially in rural areas where there is a greater reliance on car journeys.</p>	
<p>Keele Parish - Specifically on point 2 we would like to see published the criteria that will be used to assess applications and would hope to see that the views of the local community would also be sought, as they are the users of the space.</p>	

70. FDLP Policy SE5: Biodiversity and Geodiversity

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Environment Agency - We note the inclusion of a minimum 10% increase in BNG (Biodiversity Net Gain) and use of the most up to date metric. Our focus would be on blue infrastructure. We encourage the use of a natural capital approach to prioritise the use of nature-based solutions within all planning applications. We reiterate the importance of integrating green and blue infrastructure.</p> <p>The policy or text could reference the Local Nature Recovery Strategy as a key part of the evidence base.</p>	<p>The Council recognises the importance of protecting and enhancing biodiversity and geodiversity in the Borough. The feedback received on Policy SE5 'Biodiversity and Geodiversity' in the Regulation 18 Local Plan has been carefully considered, and the Regulation 19 Plan includes strengthened policy wording and an updated evidence base to address those concerns and align with the latest national policy and guidance.</p> <p>Biodiversity Net Gain:</p> <p>The Plan explicitly incorporates the requirement for mandatory Biodiversity Net Gain (BNG), as mandated by the Environment Act 2021. Policy SE7 'Biodiversity Net Gain' sets out a clear framework for achieving BNG, requiring all new developments to achieve at least a 10% net gain in biodiversity using the appropriate BNG metric. SE7 acknowledges the need to use the most up-to-date Biodiversity Metric, which is currently Biodiversity Metric 4.0. SE7 also outlines the BNG hierarchy, prioritising on-site delivery and encouraging the integration of BNG with the wider ecological network, aligned with the principles outlined in paragraph 180a of the NPPF.</p> <p>Addressing Concerns About Off-Site BNG:</p> <p>Whilst the Plan prioritises on-site BNG delivery, it recognises that off-site contributions may be necessary in some cases due to site constraints or the need to achieve broader biodiversity objectives. The Council will explore the creation of a Habitats Bank and offsetting sites register to facilitate off-site delivery and ensure that it contributes strategically to the Borough's Nature Recovery Network. This approach will allow for a flexible approach to BNG delivery, balancing on-site provision with off-site contributions and the potential use of statutory credits, where appropriate.</p> <p>Designated Sites and Habitat Protection:</p> <p>The Plan strengthens the protection of designated sites for nature conservation. Policy SE8 'Biodiversity and Geodiversity' now requires development proposals affecting nationally designated sites to</p>
<p>United Utilities - UUW wish to discuss your approach to BNG delivery and strategic opportunities to support local nature recovery in preparation for your new local plan. Biodiversity measures should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity.</p>	
<p>The policy is welcomed, though it is generic. It would be useful to recognise the role of neighbourhood plans in providing more locally specific policies on bio and geo-diversity.</p>	
<p>The Primary Legislation requiring mandatory Biodiversity Gain becomes effective from September 2023 - although the Environment Act 2021 does not appear to be mentioned at all in your document. The word "should" be used inappropriately in the consultation document despite there being a legal requirement which must be met. This really ought to be made clear in your proposed policy and the information supporting the policy.</p>	
<p>Natural England - We welcome the inclusion of net gain and offer the following suggestions:</p> <p>The use of a map in the plan ensures compliance with national planning policy and effectively demonstrates the relationship between development sites and biodiversity net gain opportunities.</p>	
<p>Natural England - The policy should outline the delivery and management of biodiversity net gain, prioritise habitat creation or enhancement, and the approach to onsite and offsite delivery. Natural England recommends</p>	

on-site provision for delivering gains close to loss areas, while off-site contributions may be necessary due to limitations or to meet biodiversity objectives. Further details could be provided in a supplementary planning document.	demonstrate that the benefits of development clearly outweigh harm to the nature conservation value of the site, and those affecting locally designated sites must show that the need for development outweighs the harm.
Natural England - Monitoring: The plan should include monitoring requirements for biodiversity net gain, including specific indicators to demonstrate the amount and type of gain provided through development. Local Planning Authorities should collaborate with partners like the Local Environmental Record Centre and wildlife trusts to share data and consider long-term habitat monitoring requirements. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up-front information on monitoring will help to streamline the project stage.	SE8 also incorporates Natural England's suggested wording change from "safeguard and enhanced" to "conserved and enhanced" for designated sites, providing stronger protection for these valuable areas. Additionally, the policy requires a Habitats Regulations Assessment (HRA) for proposals that could impact internationally designated sites (including candidate sites) and explicitly references the need for a project-level HRA where a proposal could impact a 'Habitats Site'.
Natural England - Designated Sites - We advise that the wording of paragraph 3, should be changed and instead of “safeguard and enhanced” the paragraph should state “conserved and enhanced”. We advise that reference should be made to the requirement for a project level Habitats Regulation Assessment (HRA) where a proposal could impact on a Habitats Site(s).	Integration of Green and Blue Infrastructure: The Plan emphasises the integration of green and blue infrastructure with biodiversity enhancement efforts. Policies SE3 'Flood Risk Management' and SE4 'Sustainable Drainage Systems' directly address the Environment Agency's (EA) focus on blue infrastructure by promoting sustainable drainage systems and requiring developments to minimise adverse impacts on watercourses and water quality. These policies, along with Policy SE14 'Green and Blue Infrastructure', promote these features to manage surface water runoff, enhance water quality, and create habitats for wildlife, supporting the EA's emphasis on blue infrastructure and the importance of a natural capital approach.
Natural England - 12.32. This should be amended to “The Borough contains internationally, nationally and locally designated sites important for their biodiversity value.”	Collaboration with United Utilities: The Council acknowledges United Utilities' (UU) concerns about the potential impact of biodiversity measures on existing water and wastewater infrastructure. The Council will work closely with UU during the implementation of the Plan to ensure that any proposed BNG measures are compatible with their assets and do not create operational or maintenance challenges.
Concerns over loss of biodiversity and habitats due to development of some allocated sites.	
The Local Plan should include a link to the Nature Recovery Network and Local Nature Recovery Strategy, or if Staffordshire LNRS (Local Nature Recovery Strategy) is unavailable for Regulation 19, reference the production timetable for its inclusion.	Local Nature Recovery Strategy: The Council is aware of the emerging Staffordshire Local Nature Recovery Strategy and its potential to provide a comprehensive framework for

<p>Criteria 2 of the policy currently does not reflect how BNG is expected to work in practice. The mitigation hierarchy aims to minimise biodiversity loss, allowing for on-site, off-site, registered, and statutory credit purchases as a last resort. The mandatory implementation of BNG in November 2023 raises concerns about the emerging market for off-site biodiversity provision, potentially leading to increased reliance on statutory credit for development.</p> <p>The Council must be aware of the launch of Biodiversity Metric 4.0 in March 2023.</p>	<p>nature recovery across the county. The council will seek to ensure, wherever possible, that the policies and proposals in the Plan are consistent with the objectives of the LNRS as it is developed.</p> <p>Other Considerations:</p> <p>The Plan also addresses the following concerns raised during consultation:</p> <ul style="list-style-type: none"> • Role of Neighbourhood Plans: Policy SE8 explicitly encourages Neighbourhood Plans to develop more localised policies on biodiversity and geodiversity, ensuring that local communities can play a role in shaping how BNG is implemented in their areas. • Specific Site Impacts: Specific concerns regarding potential biodiversity loss from development on allocated sites will be carefully assessed during the planning application process, ensuring compliance with the mitigation hierarchy and the requirements of Policies SE7 and SE8. • Cost and Viability Concerns: The Plan is supported by an updated Viability Assessment (2024), which considers the costs associated with delivering BNG and demonstrates that these requirements will not prevent, delay, or reduce housing delivery, directly addressing this key concern. • Clarity and Legal Requirements: The Plan has been revised to ensure that the policy wording is clear and unambiguous and that the legal requirements for mandatory BNG are explicitly stated.
<p>It is noted that £600 allowance is made for planning obligations inclusive of a BNG contribution. Page 32 of the Local Plan Viability Study 2023 - HBF would question this figure, as this is an emerging policy area and the market for off-site provision, and statutory credits are not yet known, it is noted that the Viability Appraisal allows £3500 for section 106 contributions per plot inclusive of £600 for BNG costs. Clearly this figure will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available.</p>	
<p>There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment, some of which are unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. An update to the Viability Assessment will be needed to accompany the Reg 19 consultation.</p>	
<p>The Metric already accommodates the distance from the development site for proposed off-site BNG units. However, introducing a more rigorous sequential test could add unnecessary financial burden to development and contradict PPG (Planning Practice Guidance), as it is already accounted for within the Metric.</p> <p>The policy also removes the ability for BNG to be delivered in the NCA or for a developer to be able to use national statutory credits.</p>	

<p>Unless the Council have an active strategy for delivering BNG within the Borough the requirement is unreasonable and contrary to national requirements and legislation. The Council should therefore remove the requirement and instead rely on national policy. Recommendation: Amend Policy SE1 point 2 as follows: 2. <i>Major development should calculate biodiversity net gain using the most up-to-date version of the Biodiversity Metric calculation. For minor developments, the latest small sites metric (or equivalent) should be used to calculate net gain.</i> Note: It is recommended to delete the rest of the text - from 'Biodiversity net gain' to 'Borough boundary'.</p>	
<p>Audley Parish – Policy is fairly generic, would be useful to recognise the role of NPs</p>	
<p>CPRE Staffordshire - The word 'should' is used inappropriately in the consultation document despite there being a legal requirement which must be met.</p>	

71. FDLP Policy SE6: Historic Environment

Summary of Main Issues Raised	How the main issues have been taken into account
Concerns over the impact of development on the historic environment.	<p>The council recognises the significance of the borough's rich and diverse heritage and the strong public desire for its protection and enhancement. In line with most respondents who called for a local policy on heritage, the Local Plan includes Policy SE9 'Historic Environment', which sets out a comprehensive framework for conserving and enhancing the borough's heritage assets.</p> <p>The council acknowledges concerns that new development should be carefully planned to minimise impacts on the historic environment, specifically the need to protect long-standing views and to locate new development away from places of historic interest. Policy SE9 directly addresses these concerns by requiring development proposals to "respond positively to local character and distinctiveness and should conserve and, where possible, enhance the significance of all heritage assets and their settings."</p> <p>The policy emphasises a sensitive approach to design that considers the impact of development on listed buildings, scheduled monuments, registered parks and gardens, conservation areas, and the wider historic environment, including key views. This approach aligns with the feedback calling for designs to be sympathetic to the area and in keeping with local buildings.</p> <p>The Plan also recognises the need for measures to protect heritage assets from theft or damage. Policy SE9 requires Heritage Impact Assessments (HIAs) for all proposals that could potentially impact designated or non-designated heritage assets. These assessments, informed by the Historic Environment Record, will help ensure that potential harm is identified and mitigated, contributing to the preservation of the borough's historic environment.</p>
Canal and Rivers Trust - As drafted this policy currently appears to lack any borough specific aspirations for the protection and enhancement of the historic environment sought through the majority of the plan's Strategic Objectives. This policy could be expanded to better reflect the plan's Vision for the borough.	
The policy should be revised to make it clear that any application which results in the loss of or substantial harm to a Grade II listed building, monument, battlefield, park, or garden will not be approved.	
The Wedgwood Monument at Red Street is a scheduled monument, which should continue to be protected.	
For clarity, and consistency with the NPPF, point 2 of Policy SE 6 Historic Environment should use the wording "appropriate or proportionate to" rather than "suitable to".	
Historic England- We have further requested that appropriate Heritage Impact Assessment (HIA) is undertaken to ensure that the most suitable sites are brought forward which do not harm the significance of heritage assets. Where harm is identified we would expect the Plan to set out what avoidance/ mitigation measures are available to overcome the identified harm. Qualified and appropriate professionals should undertake the heritage assessments. Are there other relevant documents that can be listed here such as Conservation Area Appraisals and Management Plans, Historic Townscape, Landscape Character Assessments. Amend 'registered historic parks and gardens' to 'registered parks and gardens' and amend 'scheduled ancient monuments' to scheduled monuments.	
Audley Parish – Policy is generic and could focus more on specific heritage assets in the borough	

<p>Keele Parish - We would like to see some reference to the policy with regard to the Conservation Areas within the Borough, and how development proposals would be assessed.</p>	<p>The council acknowledges the diverse views on the role of local knowledge in designating and managing heritage assets. The Plan supports a balanced approach that recognises both the expertise of professionals and the valuable insights of local communities. Policy SE9 requires consideration of local character assessments, heritage and design policies, and any locally identified non-designated heritage assets, as well as consideration for adopted Neighbourhood Plans, ensuring that local knowledge is incorporated into the decision-making process.</p> <p>The Plan also recognises that preserving heritage extends beyond buildings and structures. It encompasses the protection of the wider historic landscape, including the borough's industrial heritage, which multiple respondents highlighted as a priority. This is further emphasised in the Heritage Topic Paper (ED015), which provides a detailed assessment of the borough's historic assets and the importance of their settings.</p> <p>Policy SE10 'Landscape' requires development proposals to be informed by the historic landscape character mapping provided by the Staffordshire Historic Landscape Characterisation Project, and to identify and protect key historic landscape features and their settings.</p> <p>Whilst the Plan does not currently include specific provisions for visitor centres, information boards, or monuments, the council will continue to explore these and other creative measures to promote the borough's history and heritage as opportunities arise, in line with the feedback received.</p> <p>The council is committed to working with Staffordshire County Council and other stakeholders to ensure that the historic environment evidence base is up-to-date and robust.</p>
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72. FDLP Policy SE7: Landscape

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Historic England - The policy should reference historic landscape. Consider how the policy will ensure that historic landscapes and heritage features are protected and that opportunities are sought to enhance the historic environment. How have the evidence-based documents referenced been used to understand the impacts of the proposed allocations?</p>	<p>The Council recognises the importance of the Borough's diverse and valuable landscapes and their contribution to the quality of life for residents. The feedback received on Policy SE7 'Landscape' in the Regulation 18 Local Plan has been carefully considered, and the Regulation 19 Local Plan incorporates a number of changes to address those concerns.</p>
<p>Historic England - We would expect to see Heritage Impact Assessment (HIA) or similar, available during this process, prior to the allocation of sites to ensure that the most appropriate sites are put forward for development and that all avoidance and mitigation measures have been considered, that reasonable alternative sites have been considered and that sites are ruled out where there is harm to heritage. Several links are included in the rep to assist in the next iteration of the Local Plan.</p> <p>We can assist the Council in preparing Heritage Impact Assessments methodology and expect evidence in the next Local Plan. However, we cannot comment on proposed site allocations without appropriate evidence.</p>	<p>Addressing Concerns and Enhancing Policy SE10:</p> <ul style="list-style-type: none"> • Historic Landscape Considerations: Responding directly to Historic England's recommendation, the Regulation 19 Plan explicitly incorporates historic landscape considerations into its policies. Policy SE10 'Landscape' now requires development proposals to be informed by the historic landscape character mapping provided by the Staffordshire Historic Landscape Characterisation Project. This mapping, along with the assessment of historical development in the Landscape and Settlement Character Assessment Study (ED023), helps to ensure that new development is sensitive to the Borough's evolving landscape character and that opportunities to enhance the historic environment are considered. • Protection of Key Landscape Features: The Plan emphasises protecting existing landscape features, such as mature trees, hedgerows, watercourses, and traditional field patterns. Policy SE10 now requires development proposals to conserve and enhance key landscape characteristics, referencing the Newcastle-under-Lyme Landscape and Settlement Character Assessment Study (ED023) and its associated guidance. SE10 includes a list of key natural and historic landscape features to be identified and protected, reflecting the Borough's specific
<p>United Utilities - Landscaping U UW supports the inclusion of Policy SE7: Landscape.</p> <p>The text emphasises the importance of early evaluation of surface water management opportunities in landscaping works, particularly in relation to the requirement for new streets to be tree-lined, a national policy requirement as stated in paragraph 131 within the National Park Policy. Therefore, the following wording is recommended for inclusion within Policy SE7: "<i>Landscaping proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. Landscaping proposals must evaluate and identify opportunities for sustainable surface water management.</i>"</p>	

United Utilities - We recommend incorporating water re-use in redevelopment proposals, such as grey water recycling, and considering the impact on utility services when planting new trees. Planting too close can lead to root ingress, increased drainage system failure, and flood risk.	<p>character, and aligning with the public's desire for a policy that acknowledges the value of the Borough's rural heritage.</p> <ul style="list-style-type: none"> • Integration of Sustainable Water Management: The Plan incorporates United Utilities' (UU) recommendations regarding the integration of sustainable water management into landscaping proposals. Policy SE10 now explicitly requires that landscaping proposals, including proposals for tree-lined streets, be integrated with the strategy for sustainable surface water management. It also mandates that new tree planting considers potential impacts on utilities and pipelines and that the consideration of water reuse/greywater recycling for major developments be included. This ensures that landscaping schemes are designed to manage surface water runoff sustainably, protect water quality, and minimise the risk of flooding. • Sensitivity to Landscape Change: The Plan acknowledges the sensitivity of certain landscapes to change. The Landscape and Settlement Character Assessment Study identifies the entire southern portion of the borough as highly sensitive to landscape change. Policy PSD4 'Development Boundaries and the Open Countryside' guides development in these areas, encouraging sensitive design that respects the rural character and minimises the impact of development. This aligns with the public's concerns about the impact of development on the rural landscape. • Role of Neighbourhood Plans: The Plan acknowledges the value of Neighbourhood Plans in providing more localised guidance on landscape matters. Policy SE10 requires proposals to consider landscape policies, local landscape designations, landmarks, and key views identified in any relevant adopted Neighbourhood Plans, ensuring that local communities have a voice in shaping the future of their areas. • Species of Local Provenance: The Plan now explicitly requires the use of "species of local provenance" in planting schemes,
United Utilities - It will be important that applicants refer to our "Standard Conditions for Works Adjacent to Pipelines" and consult with us when implementing the delivery of landscaping proposals.	
United Utilities - Planting should consider proximity to existing or proposed utility assets to avoid root ingress and avoid planting trees directly over water/ wastewater assets or during tree removal.	
We are supportive of Policy SE7, we see the landscape at Bent Farm as important in helping to create an appropriate design response, and thus enhancing the scheme.	
Neighbourhood plans could provide more localised landscape policies, focusing on designated /valuable landscapes within the area	
The policy is generic. It would be useful to recognise the role of neighbourhood plans in providing more locally specific policies on bio and geo-diversity.	
We agree in principle but would not wish to see "pastiche" development preferred to innovative and sustainable development.	
In subparagraph 3, while the specification of 'native' species is welcomed, referring additionally to species 'of local provenance' would be preferable.	
Audley Parish – Policy is generic and could focus more on specific to the borough	
Keele Parish - would not wish to see "pastiche" development preferred to innovative and sustainable development. Modern design can blend with existing buildings.	

	<p>promoting ecological benefits and enhancing biodiversity. This addresses the feedback calling for a more ecologically sensitive approach to landscaping.</p> <ul style="list-style-type: none"> • Landscape and Visual Impact Assessments (LVIAs): The Plan requires LVIAs for major developments or those with the potential for significant visual and landscape effects. These assessments must be proportionate to the scale and likely impact of proposals. LVIAs have been undertaken for the proposed site allocations, ensuring that they meet the requirements of SE10 and other relevant policies. <p>The Council believes that the revised Policy SE10, in conjunction with the Plan's other policies and supporting guidance, provides a robust framework for protecting and enhancing the Borough's diverse and valuable landscapes and ensuring that new development is sensitive to its surroundings and contributes positively to the overall character and quality of the environment.</p>
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73. FDLP Site Allocations

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Environment Agency - We have not reviewed all the site allocations. We note however that the list of proposed sites does not fully identify site vulnerabilities in terms of land contamination, ground water vulnerability, proximity to regulated industrial processes / landfill and flood risk from unmodelled watercourses and recommend these be clearly identified for transparency. A level 1 SFRA update is recommended to support site selection. We would recommend modelling but acknowledge that in similar circumstances other LPA's have used other methods such as the risk of surface water flooding map, proximity to watercourse/flow, historic flood data and flood risk from other sources to determine risk. The assessment will determine the suitability of each site for development, with appropriate planning policy recommendations. If you wish to discuss further, we can offer a meeting or document review as part of our cost recovery service.</p>	<p>This section should be read alongside the comments on individual sites found later in this consultation report.</p> <p>Collectively the evidence base that accompanies the Final Draft Local Plan has formed the basis for decisions as to which sites have been chosen to be site allocations. Of particular significance in elucidating the thinking on individual localities are the Sustainability Appraisal, Habitats Regulation Assessment, Green Belt Assessment Part 4 (ED008), Strategic Housing and Employment Land Availability Assessment (ED006a) and the Site Selection Report and Assessments (ED029).</p>
<p>Staffordshire and Stoke-on-Trent Integrated Care Board. - The ICB has engaged with the LPA (Local Planning Authority) on the Infrastructure Delivery Plan and site options. The draft plan supports sustainable communities by keeping key infrastructure up with planned growth. The approach for healthcare estate is informed by Strategic Estates Plans for each primary care network and a wider system infrastructure plan covering the SSOT ICS. Further clarity on the emerging strategy will be shared with the planning authority.</p>	<p>The breadth of both strategic & non-strategic policies presented as part of the Final Draft Local Plan, including a discrete policy for each site allocation, is part of a positive planning strategy to deliver the Borough's identified development needs for housing and employment & to ensure that this is achieved in the most sustainable manner. Opportunities afforded from brownfield land have been exercised wherever possible, with a focus for development in the urban area of Newcastle which benefits from the highest levels of accessibility & infrastructure provision.</p>
<p>Cycling UK - 1) the local plan should contain a requirement that all future masterplans for site allocations should show how future residents can safely walk or cycle to local facilities and where appropriate provide land and or funding to provide the walking and cycling routes needed. 2) The local plan should contain a commitment to carry out public consultation on the masterplans for site allocations so that local input can help ensure the masterplans provide adequate walking and cycling routes.</p>	

Incentives for converting empty shops into residential accommodation are lacking, despite the potential to boost the town's economy and attract more people to the centre.	
An individual is seeking clarification on the proposed development of land SP5, as they are unsure if this site is being proposed or not, they are requesting clarification as they would provide an objection.	
Given the current climate concerns we should be proposing a total ban on green field developments within the borough.	
Concerns about building on Green Belt land rather than brownfield. Loss of habitat and wildlife in meadows gives great concern to some residents.	
Query that potential allocations consist of 956 over the residual target, including strategic sites it is "around" 1613 over the residual target. This does not include a windfall allowance. In these circumstances we believe that your council is massively over-allocating land for new housing. We ask the council to explain this to the public. CPRE.	
The council's preference for brownfield development is acknowledged, but most proposed housing allocations are on greenfield sites. We request that the number of new homes on brownfield land and greenfield land, as well as the total area of land in the allocations to be placed in a table. The council's ownership interest in one of the proposed sites in the Green Belt is also questioned. CPRE.	
Comment stating that non-preferred site BL3 should be incorporated into Harding's Wood open space area. Justification for this is also given.	
Comments justifying objections to the development of non-preferred sites NC80,81 & 82.	
The draft Local Plan should prioritise identifying land/sites suitable for renewable energy developments and potentially include client's land in Talke, as highlighted in Appendix A. Knights.	
Comments supporting the inclusion of Green Belt site MD12 as an allocation. The rep includes a Masterplan and supporting evidence and provides arguments around housing need and exceptional circumstances.	

Comments supporting the inclusion of Green Belt site AB30, Comment includes details of sites suitability and sustainability, and the agent has attached supporting documents / plans.	
Comments supporting the inclusion of a site at Shraleybrook Road, which is currently proposed for inclusion within the village boundary of Halmerend. The agent believes that the omission of the village boundary around the access was in error, and it is requested that the land proposed to provide the access to the site is included as well. The rep includes details of the site history and further information is attached.	
Comments supporting the inclusion of Green Belt site Land at New Farm, Cross Lane, Audley as an allocation. Agent includes details of sites planning history, suitability and sustainability, and supporting documents / plans are attached.	
Promotion of site KL21, including the submission of a detailed Development Statement and Illustrative Masterplan.	
The plan attached to Appendix D suggests a suitable site at Bar Hill in Madeley for housing development, including a few self-build plots, to meet the Borough's housing needs. It is logical given its proximity to the urban edge and large draft site allocation.	
Promote Green Belt land known as White Rock (CFS116), and for it to be allocated for an employment use to expand its business. The rep includes details of the operations, need for the expansion, planning history and suitability of the site. Further information is attached.	
United Utilities - UUW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation.	
CPRE Staffordshire - By adding all of the proposed housing allocations for in Table 5 we found a total of 'around' 4995. This is 'around' 956 over the residual target.	

74. FDLP Approach to Strategic Allocations

Summary of Main Issues Raised	How the main issues have been taken into account
Large employment sites in urban areas rather than using Green Belt land / rural land. For example, Lyme Valley Park, Festival Park and Rycroft.	This section should be read alongside the comments on individual sites later in the consultation report. The Council has sought to allocate employment sites that provide for a mixture of job opportunities. The Plan has now identified those strategic employment allocations that it wishes to support through the Local Plan.
Stoke-on-Trent City Council - Given shared functional area with Stoke, the council would encourage end uses which provide better quality, higher paid, secure jobs over warehousing development.	
Allocating strategic employment land in Green Belt in contrary to the council's strategic objectives	
The quality of employment these sites offer tends to be of a lower standard when compared to the aspirational rural occupations that the development threatens to displace.	
The sectors described in the proposed sites are increasingly adopting automation and robotics, leading to a decline in the number of available jobs	
Title should be explicit and refer to Strategic employment allocations	
Whether there is a need for strategic housing allocations and Greenbelt release to enable strategic employment allocations	

75. FDLP Residential and Employment Allocations

Summary of Main Issues Raised	How the main issues have been taken into account
<p>United Utilities - Chapter 15 includes various site-specific requirements. These are not considered to be sufficiently comprehensive to address the matters raised in this representation. The opportunity to liaise with the LPA is requested to ensure that the matters raised are sufficiently identified for further consideration as part of the development of the sites as site specific requirements. In some instances, a recommendation is made that the matters raised are addressed prior to progressing the allocation further as the issues could affect the principle of development. When considering a range of sites to meet development needs through the site selection process, it would be more appropriate to identify new development sites, especially sensitive uses, such as housing, which are not close to a wastewater treatment works. This position is in line with the agent of change principle (para 187 of the NPPF), with it important to define clearly the mitigation being proposed to address any potential significant adverse effects that are identified, alongside any impacts of the site allocation on existing infrastructure provision. Property interests including rights of access and reservoir flooding zones are also highlighted as aspects for the LPA to be conscious of.</p>	<p>The policy approach has been restructured to provide for table 6 'site allocation requirements which provides for a comprehensive list of site requirements, linked to relevant policies in the Plan. This is then supported by detailed policies for individual allocations in the Plan. The site allocations, in the Local Plan have been identified following the implementation of a site selection methodology outlined in document ED029. The Council has taken account of commitments and completions in considering the need for allocations through the Local Plan.</p>
<p>Objection to the omission of the Land at Audley Road, Chesterton, ST5 6BT. The Site comprises two parcels, Part A measures around 0.42 hectares in area and Part B 0.62 hectares. Considered that either the either whole Site or Part A (adjacent to Audley Road) should be allocated for residential development. Part A and Part B have previously been submitted via the Council's Call for Sites process and the 2 parcels are included in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) within site reference number CT25 - Land off Audley Rd, Chesterton, which also includes a larger area of land. Part A adjacent to Audley Road should be included within a redefined development boundary also enclosing the existing housing fronting the road to both the north and south. Part B is to the rear and together the</p>	

two areas total around 1 hectare in extent. Detailed arguments presented to justify its allocation for development taking account of numerous factors such as the existing built form, Green Belt purposes, sustainability factors, timeframes for delivery and the sites physical characteristics, as well as any potential mitigation measures.	
There are some other urban sites which are not identified within the Draft Local Plan which can make a meaningful contribution to affordable housing supply in the Borough. These include regeneration opportunities in terms of replacing moribund accommodation with modern affordable homes that are fit for purpose and built to the latest standards. Reference is made to the current planning status of sites at Cross St, Gloucester Grange & St Luke's close. A commitment is expressed to deliver affordable housing schemes in and around Newcastle-under-Lyme as well as being committed to taking on affordable housing delivered as part of open market schemes.	
An area of land to the west of Newcastle Road, Talke has been proposed (also via a Call for Sites submission) for the purpose of creating electric vehicle charging and related facilities.	
Request to amend the village boundary of Keele to include land adjacent to 3 Highway Lane, Keele, within the village boundary. This would enable this site to be developed for a single self-build family dwelling.	
Land to the rear of the houses numbered 1 to 15 in Slacken Lane and identified in the draft plan of 2018 as BL3 and marked on the new local plan as Harding's Wood, should be included in the Open Space Strategy, in addition to the area behind Millstone Avenue, as both formed the subject of a Village Green application and inquiry. This plot was submitted for consideration for the building of 55 houses in the 2018 Local Plan, and reasons as to why this land was unsuitable were given at the time. It is considered that those reasons have not changed. Detailed presentation of concerns stated covering aspects such as highway access into the site, heritage, amenity, topological issues, loss of mature fields, with associated highways, infrastructure and character & appearance impacts, should development take place. Land at Harding's Wood &	

Millstone Avenue should be retained as open space for the biodiversity they support, and the physical and mental health benefits of the community.	
Staffordshire County Council - Broad support for the need to allocate employment land in Newcastle under Lyme given the shortage in recent years. However, sites that are being considered as strategic allocations in the Local Plan should demonstrate that they are deliverable with the right choice of sustainable transport options. A compelling evidence base should also identify where there is a need for a specific type of employment use subsequently leading to these types of use coming forward and being allocated in the plan. Consideration should be given to clever design which is built around a good sustainable transport system rather than a good highway network. Whilst existing bus services may have some capacity, there is going to be a requirement for additional services. For instance, if there is a proposed link road through to Keele University from site TB19, there could be an opportunity to provide a joined up public transport system which could serve most new sites in and around Keele, thus providing a good sustainable option for residents.	
Objection to the Draft Local Plan and request the removal of the land East & West of Wereton Road, Audley from the Green Belt and the allocation of the site for residential development – the sites having been previously submitted through the Council’s Call for Sites process - SHELAA references AB72 & AB73. Arguments to justify its inclusion in the Local Plan relate to an evaluation of the site against Green Belt purposes, them not being subject to any other statutory or non-statutory designation, relationship to the existing built form, sustainability factors, timeframes for delivery and the sites physical characteristics.	
National Grid Electricity Distribution (Southwest) Plc - In allocating land affected by high voltage power lines, the LPA should consider the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. In light of the above, NGED does not object to the allocation of land upon	

<p>which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan: 1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land. 2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible; 3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above. 4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.</p>	
<p>Object to the land allocations set out in section 15 of the draft plan and request the allocation of the Land adj. Rowley House, Moss Lane, Madeley for residential development. It is considered that the land would form a suitable complementary site (to the existing preferred allocation MD29) that would support delivery of new homes and provide choice in the local housing market. Its reallocation would reflect the need to consider reasonable options and minimise Green Belt release. The detailed characteristics of the site and its surroundings, its suitability for development and its deliverability are considered in more detail, including it providing non-Green Belt land adjacent to a defined rural service centre. Technical matters, such as drainage, are also evaluated further.</p>	
<p>Party with a specified land interest supports the (continued preferred) allocation of the BW1 site for employment purposes.</p>	
<p>Broadly sceptical regarding the scenarios for economic growth (HENA 2023) and note that the scenarios offered by Cambridge Econometrics, Oxford Economics and Experian are divergent. The HENA 2023 update is</p>	

not considered realistic, nor the argument made, that increasing the housing supply will necessarily promote job growth and encourage more people to the area. The right homes to support a potential workforce need to be built in the right place and there is limited evidence that thought has been given to such fine-grained issues.	
A land interest (<i>n.b. not currently stated as a preferred allocation</i>) at Woodside, Baldwins Gate is promoted, the extent of which was also submitted to the Council as part of the Call for Sites exercise that took place in January 2022. Reference is made to the outline planning application submitted by Richborough Estates elsewhere in Baldwin's Gate, related to the erection of up to 200 homes within a community parkland, with the application subsequently allowed at appeal. Aspects of the Inspector's conclusions in upholding the appeal with regards to the settlement's sustainability including public transport provision are also highlighted.	
Once any of the sites are accepted in the Local Plan, the developer will have carte-blanche to build on them. Residents nor councillors will be able to reject the planning applications with regards to these sites. Therefore, development on sites AB2, KL13, KL15, SP11, 12 & 23, TB19, CT1, TK30, BL18, i.e. building on Green Belt land, should be rejected.	
Development should not take place on the former Keele golf course site, owing to loss of green infrastructure, its recreational value and it being in the Green Belt. Existing properties for older people should not be sold off by housing associations owing to the increasing demand for these types of properties, plus their retention reduces the pressure for development elsewhere.	
The Sky Building close to Newcastle town centre and other empty buildings could be put back into circulation, as a priority, to create a substantial amount of accommodation, including for single people.	
Land is being promoted at Madeley Heath (SHELAA ref: MD12 - <i>n.b. not currently stated as a preferred allocation</i>) for around 240 homes (market and affordable) and community uses (potentially new primary school, sports pitches, public open space, and wider greenspace). The Rural	

<p>Centre of Madeley and Madeley Heath (joint) justifies more housing due to its role and infrastructure capacity. In addition, there are concerns about the deliverability of the single preferred site in Madeley (site ref. MD29) due to significant environmental constraints and its failure to prevent urban sprawl. SA (Suitability Appraisal) Section 3 should test a fourth higher housing delivery option in line with the NPPF and PPG to meet the acute affordable housing need for the Borough. SA Section 5 should also test all reasonable growth options available within the Borough. For example, a more positive approach to Green Belt land release around the sustainable Rural Centres (e.g. Madeley & Madeley Heath). Whilst in principle the FDLP correctly acknowledges the need for Green Belt land release to meet housing targets, insufficient Green Belt land is being released. The approach to the distribution of housing is also lacking evidence and fails to recognise the larger role which Madeley and Madeley Heath could play to meet this need, subject to identifying a suitable site allocation. The credentials of the site are highlighted, with suitability, availability and achievability arguments made, allied to consideration of harm to the Green Belt.</p>	
<p>Certainty of delivery of the number of homes needed to meet the Objective Assessed Housing Need is fundamental to the successful implementation of the Local Plan strategy. The supplemental text should be clarified to enshrine this point of principle. Only those sites that have passed the test deliverability should be included in the site allocations list. Site AB12 demonstrably fails this test.</p>	
<p>There is an extremely low level of employment in the Audley area and any jobs that would be on offer through industrial or warehouse areas would not be relevant or benefit the local community. Availability of other brownfield opportunities along the A500. The exceptional circumstances for Green Belt release need to be explained.</p>	
<p>Site specific comments to NC13 (Land West of Bullockhouse Road, Harseahead): The council is urged to review its targets for new housing in the Borough to reflect the actual need (both in number and type of dwellings). Reflecting on neighbourhood & Borough specific housing</p>	

<p>needs surveys undertaken allied to the constraints of the Green Belt (& it being developed only in exceptional circumstances). Reductions in population forecasts, the nature & character of the rural settlements, delivery rates of new homes over the last decade should all be factored in. Contradictory to the 2022 SHELAA conclusions. Impacts on nature & wildlife, achieve the opposite of supporting green infrastructure, landscape & carbon footprint, increasing urban sprawl and coalescence of settlements. Brownfield land & empty homes availability. Prime Minister's recent statements on Green Belt and not concreting over the countryside. Development will conflict with the Local Plans Strategic Objectives and the Newcastle-under-Lyme Council Shared Prosperity Fund including damage to watercourses, natural drainage and loss of greenspace. Mining legacies. Ecological impacts (referred to in a detail following a survey). Infrastructure including sewage capacity, public transport (including the benefits of improved connectivity to Kidsgrove Railway Station), wider green infrastructure (including carbon capture), traffic & road network repercussions (such as at Pennyfields Road). Proposals do not accord with Local Plan policies IN1, IN2 & SE1. Consider development at Talke Pits & only look to bring forward development in this locality once other options have been exhausted.</p>	
<p>Object to the omission of the land at Slacken Lane, Kidsgrove (Ref: BL4) from the list of housing allocations and it being identified instead as a protected open space within the Draft Local Plan. Detailed argument presented elucidating that the extensive technical work that has already been undertaken by & on behalf of those with an interest in the land, confirms that there are no constraints that could not be addressed while bringing the site forward for development. Viability, it being sequentially preferable to other sites, wider existing greenspace provision in the locality, allied to addressing favourably the SHELAA parameters, were also highlighted. Developer ambitions for the site's development further amplified the arguments for new homes being built within this site.</p>	
<p>There are no allocations currently proposed in Baldwins Gate and this conflicts with the spatial strategy set out in PSD 2 which emphasises the</p>	

<p>role of Rural Centres in meeting the Borough's housing need. The Rural Area Topic Paper also shows that Baldwins Gate is one of only 2 Rural Centres which meet all sustainability criteria without being considered jointly with a nearby settlement. Taking account of this & other factors, site ref: LW38 should be allocated as a residential development site. The arguments for it being discounted from consideration for allocation based on concerns over access arrangements into the site and the loss of agricultural land are challenged, with reference to the recent appeal decision at Baldwin's Gate Farm.</p>	
<p>Supports the Local Plan site selection rejection of and agree with the considered reasons for each parcel of land for rejection, of the sites put forward in the Maer & Whitmore Ward: LW6, LW7, LW9, LW38, LW42, LW48, LW78, LW83 & LW84. It is considered that each of the rejected locations lacks facilities and services, lies outside the village envelope and is in an unsustainable location.</p>	
<p>Arguments made which highlighted the merits, mitigation and pitfalls, including design & land-use suggestions, for many sites across the Borough. On a settlement by settlement basis, these include sites in Crackley, CT1 and greenspace & traffic impact aspects; Keele, where it is stated that it is vital that a green woodland area is kept between KL15 and Paris Avenue estate; Holditch, where CT20 is felt to be an appropriate employment site, but as it is clearly visible from Apedale Country Park, it should include trees that screen the buildings to some extent; Knutton, where KS3 should be moved further out along Blackbank road because it currently takes away a field that has been used for recreation.</p>	
<p>Locations of sites NC80, NC81, and NC82 are not suitable for development. Impacts on pedestrians, landscape & traffic (including road capacity and suitability) are highlighted. Similar concerns also expressed to NC13 as Mow Cop Road is used as direct route to the A34 from this location.</p>	
<p>Focus of comments relates to TK10, TK27 and TK17. This argues that specific infrastructure problems/difficulties in relation to these sites the</p>	

<p>proposed additional housing would cause already inadequate roads to become impossibly congested and to deteriorate even further. Connected to this, given that the current schooling and health facilities in the village would not sustain a sudden increase in population, would further development and therefore more land be needed to build more schooling and medical facilities? This would force the current population who currently reside in the village to find schools places outside of the direct area Thus adding to the car emissions and further reducing air quality. The smaller neighbourhood centre at Talke and the heritage implications of the Grade II listed, Wedgewood Monument are highlighted. Other factors identified include amenity impacts for existing residents; environmental damage, mining legacy and impacts on watercourses & drainage.</p>	
<p>Land situated at southwest of High St, Kidsgrove & objection to its omission as a preferred site in the Draft Local Plan. Reference is made to a 2021 Call for Sites submission made for this site & supporting documentation from Aspire Housing, the adjoining landowner, through whose land access is proposed, confirming the Association's in principle agreement to the proposal. It is considered that development would have minimal adverse impact on the purposes of Green Belt, particularly vis a vis sites that are currently preferred. For reasons including Biodiversity Net Gain, housing density & types, the Council has seriously over-estimated the number of new homes which will be delivered from its current allocations e.g. NC13. Newchapel is a very sustainable location for new housing, with excellent nearby facilities and infrastructure to accommodate additional housing. The land promoted, being level, grassed and only occasionally used for rough grazing, does not exhibit any significant ecological constraints, whilst professional highway consultants have confirmed that access and highway arrangements can be readily provided to serve the site's development.</p>	
<p>Object to the omission of sites, HM8 (Land West of Heathcote Road, Miles Green) & HM10 (Land off Victoria Avenue, Miles Green). Arguments advocating their allocation as residential development sites</p>	

include: aside from Green Belt, not being subject to any statutory or non-statutory designation; relationship to the existing built form; not harm the wider Green Belt & its purposes; a defensible boundary to the Green Belt can be achieved, whilst releasing the land; within convenient access to a wide range of facilities by sustainable modes; considered to be developable for housing within the first 5 years post adoption of the Local Plan.	
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76. FDLP Glossary

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Glossary should be expanded to include definition of terms: -</p> <ul style="list-style-type: none"> • Health Impact Assessment (and Rapid Health Impact Assessment) • Design Review Process • Energy Hierarchy • Mitigation Hierarchy • Biodiversity net Gain • Housing and Economic Needs Assessment • Standard Method • Nature Recovery and Local Nature Recovery Strategy 	<p>In response to requests to expand the glossary, the Regulation 19 Local Plan includes definitions for the following terms:</p> <ul style="list-style-type: none"> • Health Impact Assessment • Rapid Health Impact Assessment • Design Review Process • Energy Hierarchy • Mitigation Hierarchy • Biodiversity Net Gain • Housing and Economic Needs Assessment • Standard Method • Nature Recovery • Local Nature Recovery Strategy <p>These definitions provide clarity and ensure that key terms used in the Plan are easily understood by a wide range of readers.</p>

77. FDLP Appendix 1 Monitoring Framework

Summary of Main Issues Raised	How the main issues have been taken into account
SO, I – XII, and SO-VII are not represented in the monitoring framework, they should have indicators which trigger remedial action inadequate progress is being made in the plan period	The Regulation 19 Local Plan includes a revised and expanded Monitoring Framework (Appendix 1) that addresses the concerns and suggestions raised during the Regulation 18 consultation. The framework now includes a wider range of indicators to track the effectiveness of the Plan's policies and to trigger remedial action if targets are not being met.
Plan needs to clearly set out what would happen if monitoring showed under-delivery against the agreed housing trajectory.	Monitoring Strategic Objectives:
The Housing Mix policy delivery monitoring indicator and remedy suggests that if housing sites are not delivering the mix required the resulting remedy would be advise DM not to permit housing scheme of the 'wrong' mix. Another remedy could and should be to negotiation with developers to find a viable and deliverable housing mix solution on a case-by-case basis. Such other remedies should also be reflected in the monitoring framework.	The Monitoring Framework now includes indicators for each of the Strategic Objectives (SO1 - SO13), addressing the concern that these were not adequately represented in the previous framework. Each indicator has a specific target and a trigger point that, if reached, will prompt a review of the relevant policy and the consideration of remedial actions. Addressing Under-Delivery Against the Housing Trajectory:
Figures on affordable housing provision should be published as part of the monitoring framework.	The Plan now clearly sets out what actions will be taken if monitoring shows under-delivery against the agreed housing trajectory. This includes: <ul style="list-style-type: none"> • Five-Year Review: The housing trajectory will be reviewed as part of the Authority Monitoring Report (AMR). • Early Intervention: If monitoring shows that the trajectory is not being met, the Council will work proactively with developers and landowners to identify and address any constraints to delivery. This may involve reviewing schemes, exploring alternative funding mechanisms, or providing additional support and guidance. Housing Mix Monitoring and Remedies: The Monitoring Framework has been updated to clarify the remedies available if housing sites are not delivering the required housing mix. If monitoring shows that a development proposal is not delivering the required housing mix, Development Management will be advised. Affordable Housing Monitoring:

	<p>The Monitoring Framework now includes specific indicators to track the delivery of affordable housing, addressing the feedback requesting that figures on affordable housing provision be published. These indicators will monitor:</p> <ul style="list-style-type: none"> • The percentage of affordable housing provided on qualifying sites, and • The tenure split of affordable housing delivered. <p>This information will be reported in the AMR, providing transparency and accountability on the Council's progress in delivering affordable housing. The Council believes that these revisions to the Monitoring Framework create a more robust and transparent system for tracking the implementation of the Plan and ensuring that it is effectively achieving its objectives.</p>
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78. FDLP Appendix 2: Employment Sites in Supply

Summary of Main Issues Raised	How the main issues have been taken into account
The current availability of existing not fully utilised employment use sites in the locality e.g. at Peacock Hay and the Tunstall bypass	Employment sites in supply is now presented outside of the Local Plan, in the Employment Plan Strategy Paper [ED033]
Will the demand for these sites be monitored before a decision is made to release Green Belt land?	
Supporting information is needed to explain the purpose and context of this table to the plan-making process, particularly considering discussion elsewhere in the plan about the potential need for greenbelt release	
NC13: Comments raised to object to this site.	
Support with reference to strategic location TK30 (<i>no further detailed comments provided as a representation</i>)	

79. FDLP Appendix 3: Borough Council Car Parks in Asset Rationalisation Programme

Summary of Main Issues Raised	How the main issues have been taken into account
Smaller local car parks are vital to the small businesses that are located close by.	The Final Draft Local Plan has considered the need for allocations in the borough, including those relevant surface car parks where future development is expected to take place, when supported by appropriate evidence that the car parking is no longer required in that particular location.
Objection to the loss of car parks, including Hassell Street, Cherry Orchard, Windsor Street car parks. You are taking their choice away.	
Concern that some residents rely on small car parks as they are closely located to services and small business i.e. health provision.	
A petition submitted by several local businesses - 'Save Hassell Street Car Park' (450 signatures in hard copy and approximately 700 online signatures).	
Need to consider the safety and access implications of the loss of car parks. Many members of the community feel less safe on a multi-story car park.	
Need to consider whether there is sufficient car parking provision in Newcastle-under-Lyme Town Centre and its immediate environs	
Any replacement of the Midway Car Park needs to consider safety and accessibility arrangements	
Investment in 'Sky Building' should be prioritised instead.	

<p>The list of Council Car Parks is identified as having potential for windfall development needs to include some kind of explanation as to why this is included in the plan, and what the status of the list is. If the intention is for ongoing work on car park rationalisation will feed into the Reg 19 plan, this needs to be explained within Appendix 3</p>	
<p>Support the allocation of sites, including former car parks for housing, or mixed-use allocations if they are no longer needed for their current use. Allocations provide greater certainty for developers than bringing schemes forward on a windfall basis.</p>	
<p>This directly contravenes Strategic Objective-III, fewer usable car parks in the town will further reduce the number of visitors and hasten the decline of the town. Having a single multi story car park is not going to suit the needs of the town.</p>	

80. FDLP Appendix 4: First Draft Local Plan Site Allocations Maps

Summary of Main Issues Raised	How the main issues have been taken into account
Policy map is not clear as to where boundary lies on NC77 SHELA Report p. 163.	An interactive link has been provided in the PDF Policies document to allow an interactive presentation of the proposals in the Final Draft Local Plan.
NC78 & NC79 Development in these localities is not desired – traffic and lack of infrastructure.	
Map 1 in the policies booklet shows as Preferred site SP11 as not in the Green Belt, which it is currently, therefore this map is inaccurate and a misrepresentation of the site.	
HBF note that Draft Policies Booklet shows maps of the Green Belt and other policy designation areas. HBF would encourage the Council consider producing an interactive and searchable web based Local Plan policies map utilising GIS.	

81. FDLP AB2 (Strategic Location)

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Cheshire East Council - Concerns over highways and access implications including widening of the A500 and the impact on Junction 16.</p> <p>Bartholmey conservation area located 900m from site – heritage impact assessment needed. Site triggers SSSI impact zones of Oakhangar Moss. There is a lack of sufficient evidence or information to make a meaningful consideration of the site – heritage impact assessment, transport assessment, land impact assessment etc.</p>	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p>
<p>Stoke-on-Trent City Council - strategic employment site. Given the functional economic area our respective Council's share, the City Council would in principle support such a development but would encourage end uses which provide better quality, higher paid and secure jobs than those that are currently on offer, in the main, in existing warehousing development.</p>	<p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p>
<p>United Utilities - Site partially in Groundwater Source Protection Zone 3. Further clarity on point of connection required. Site may be unserved and nearest catchment may be UU network.</p>	<p>Policy AB2 in the Local Plan includes detailed requirements around access into the site, providing for appropriate lorry parking facilities and considering sustainable site access, including a travel plan.</p>
<p>Historic England -Consider the impacts to nearby heritage assets including Audley Mill Grade II, Audley Conservation Area and heritage assets within.</p>	<p>A heritage impact assessment has been prepared for the site and informed the mitigation measures identified in the policy. The policy requires the submission of a Heritage Impact Assessment.</p>
<p>Alsager Town Council – Development could result in an industrialised employment belt with a reduction in Green Belt in the area.</p>	<p>The policy requires further assessment including noise and air quality assessments.</p>
<p>Balterly, Betley and Wrinehill Parish Council – congestion at Junction 16, this allocation is supporting a logistics-based low skilled, low paid economy which the Council should not be targeting</p>	<p>The exceptional circumstances for the release of the site are set out in the Plan Strategy Employment Topic Paper [ED032]. The site requirements include the consideration of a sustainable energy strategy to consider utilities provision on the site.</p>
<p>Weston and Crewe Green Parish Council - The potential release of this Green Belt site as a strategic employment allocation will have serious implications for the Parish and could create pressure for the release of Green Belt within the Parish undermining the principles and function of the Green Belt in the area. Conurbation of the Parish with NUL</p>	

Barthomley Parish - It is the view of the Parish Council that without a strategy in place to cover the development of the A500 and its surrounding areas, involving all major stakeholders, the proposals will be unsustainable and will create addition traffic, thereby impacting negatively on the infrastructure of roads and other facilities in and around Barthomley as well as creating pollution and increases in the number of journeys undertaken in the area.	
The overall vision refers to jobs but makes no mention of strategic employment sites.	
Concerns about traffic impact and congestion, particularly in Audley. Concerns over the quality of the road network in Audley and its surrounds.	
Concerns around increased pollution from the warehouse and associated traffic from this development.	
Evidence suggests no need for this site. When there are new warehouses already going up in Crewe, Alsager, Chatterley Valley, Festival Park/Wolstanton, & Tunstall to name only the closest. Some of these remain empty.	
The size of the site is disproportionate and extends to larger than Audley and Bignall End	
Undeveloped land, carbon storage area	
Isolated site – lack of access to sustainable transport options	
Park Lane would need to widen to allow for Heavy vehicles which will lead to the destroying of large hedgerows which reduces biodiversity	
An increase in vehicles in the area and the use of small country lanes for lorries to the AB2 site will make exercising in this area unsafe (walking, cycling, horse-riding)	
The site is a mixture of grade 3a and 3b agricultural land - cannot afford to lose such land	
The habitat for wildlife, birds and animals, including those protected under the Wildlife and Country Act 1981.	
The site has limited access to services and utilities such as gas & electric.	

The exceptional circumstances for the site such as the employment need has not been evidenced, particularly when the employment need identified in the Plan has largely been met with land in supply (Appendix 2) of 49.9 hectares.	
Local jobs for Audley residents unlikely as a result of development due to age demographic of village and the type of jobs being proposed.	
A range of significant adverse impacts (visual, noise, light, disturbance, air quality) including impact of night-time light pollution	
Undermining of regeneration of the urban conurbation, by developing greenfield land in the countryside (regeneration is one of the purposes of Green Belts)	
Due to remoteness, limited economic benefits to Newcastle-under-Lyme.	
Concerns with the impact of TK30 (which is close to Audley). Combined, these sites make AB2 especially harmful.	
The local plan evidence work should confirm the contribution the site makes to Green Belt purposes as different assessments are made in different evidence-based documents.	
AB2 did not score positively in the sustainability appraisal.	
SHELAA 2022 found that site was not in deliverable/developable supply given that it is isolated greenbelt, partly affected by flood zones and has poor access to services and facilities – What has changed?	
Types of jobs proposed are likely to be replaced by automated processes and artificial intelligence	
The land is currently covered by policy N20 within the Saved Policies of the Local Development Plan as an “Area of Landscape Enhancement.” - Why has this changed?	
Public footpaths on site, enjoyed by walkers	
Due to location, the site would create jobs in Cheshire not in Newcastle-under-Lyme	
The area acts as a buffer between Audley Parish and the M6/ A500 noise and light pollution	

Employment provision should be focussed more towards town centres as a means of economic regeneration not rural locations.	
Destroying greenbelt land without demonstrating exceptional circumstances is counterproductive to the strategic objectives SO1, SOIV and SO XII.	
The only thing needed here is a Truck Stop of lorry drivers	
Loss of lorry park layby	
Noise, light and other pollution concerns.	
Loss of ancient, protected hedgerows.	
Any warehouses that are put up should blend in with the landscape, be friendly to wildlife and help to clean the air, with green roofs and rainwater harvesting (the A500 floods now when there is heavy rain)	
Comments from agent promoting the site. The strategic location should be extended to a boundary which has been previously submitted to the Council which includes an extra 8 ha. Several technical documents have been submitted in support of the development of the strategic location including a consideration of the need for the site, Green Belt and highways implications of the sites etc.	
Comments from the Chamber of Commerce supporting the proposed development and recognising the strategic importance to Staffordshire.	
Concerns over loss of Green Belt	
Concerns over infrastructure impact	
Objection regarding the loss of topsoil.	
Impacts on local flora and fauna	
Impacts on flood risk including surface water flooding.	
Proposed use of lanes as emergency access routes, is a dangerous proposition given their limited visibility and inadequate space for pedestrians, cyclists, horse-riders, and vehicles.	
Impact of reduction in bus services to Audley needs to be factored in	
Impacts on Audley – perceived ‘rat run’	
Amenity impacts on neighbourhood housing	

Natural England - Part of the site is good quality semi-improved grassland and potentially of high wildlife value. Potential for air quality impacts on designated sites e.g. Midland Meres & Mosses Phase 2 RAMSAR (Oakhanger Moss SSSI and Black Firs & Cranberry Bog SSSI). Some of site is best and most versatile land (ALC).	
National Highways - National Highways has been engaging with the applicant's consultant on development at strategic employment site AB2 as part of pre-application consultation since 2018. We issued comments to the consultant regarding trip generation, VISSIM model developed for M6 Junction 16 and the associated Local Model Validation Report (LVMR) in June 2023. National Highways are still in discussion regarding trip generation; therefore, we are not currently able to comment on the impact of the development on the nearby M6 J16 and other SRN junctions in the area. However, we understand that there will be a requirement to improve M6 Junction 16, with a potential mitigation scheme involving widening and inclusion of an additional lane on the gyratory of the junction. This potential mitigation scheme would require the removal of the existing heavily used layby on the A500 westbound approach. No improvements are currently proposed at the A500 / A34 Talke Interchange due to development at Site AB2.	
Concerns that use would be for logistics with limited employment opportunities	
Audley Parish – Severe impacts on Audley (included above)	

82. FDLP KL15 (Strategic Location)

Summary of Main Issues Raised	How the main issues have been taken into account
The concentration of housing in Keele is disproportionate to its scale.	<p>Allied to the comments received from interested parties, neighbouring authorities and other prescribed bodies, the merits or otherwise of allocating strategic employment site(s) in the Local Plan are evaluated within the Strategic Employment Site Assessment 2023 (ED002a), & its 2024 update (ED002).</p> <p>Within this, KL15 was one of three sites evaluated for their potential to satisfy sub-regional needs, market views on demand, and a detailed assessment of the potential sites, considering market signals, physical indicators, and sustainability factors. The site has also been appraised against the five Green Belt purposes set out in national policy within the Green Belt Assessment (Part 4) ED008. In essence, the opportunities it affords to accommodate knowledge-based industries, and high growth sectors including life sciences, would generate significant economic benefit and help fulfil the University's Growth Corridor Strategy.</p> <p>Within the Final Draft Local Plan, KL15 has a discrete policy to set the parameters for its respective development (as part of Section 13 Site Allocations). This addresses a breadth of issues such as green infrastructure, access and heritage impacts that will serve to positively shape the proposals and mitigate as far as possible any consequent harm. A masterplan led approach will also be integral to delivery of the site.</p>
The green spaces as they exist currently are a major factor in making the area attractive to residents. The capacity of vacant buildings should in the first instance be fully assessed & exploited within the 2040-time horizon, moving the emphasis away from removing land in the Green Belt.	
Wider issues argued include: development of Green Belt land will result in Silverdale and Keele merging into one large urban conurbation. Green Belt areas play a vital role in preventing urban sprawl, protecting wildlife habitats, and providing recreational spaces for local residents. Permitting development on Green Belt land could irreversibly damage the natural environment and undermine sustainable growth in the region. It is essential to prioritise brownfield development and explore alternative areas for development to preserve green spaces and maintain a balanced urban landscape. The number of empty homes in the Borough, vacant & derelict buildings in the town centre and development here being preferred as a residential & entertainment focus, reduced population figures in the 2021 census, Government statements on areas that should be the focus of development, heightened physical (e.g. road capacity, condition & suitability) & social infrastructure pressures such as GP's, dentists & schools, recreational, biodiversity & public health value of Keele golf course in particular, increased carbon emissions impacts.	
Historic England - Land East Keele University – Strategic Site – consider impacts to Keele Hall Registered Park and Garden Grade II and heritage assets within this area.	
Allied to those summarised above, directly specific objections to KL15 include: The University currently having a number of student blocks that are empty & that student numbers are unlikely to increase dramatically. Previous slow build-out rates of the University. The site being between two deciduous woods which it is suggested will likely contain bats (a protected species), loss of recreational green space (with consequent impacts on physical & mental health), rights of way & other wildlife	

<p>impacts. Increase in traffic & worsening congestion during & after construction. This heightened traffic flow poses significant road safety concerns for pedestrians, cyclists, and motorists. Elevated air pollution levels. Scale and design may not align with the existing local vernacular which could reduce visual appeal. Social displacement could occur through shifts in house prices reducing affordability for existing residents. Loss of food production capabilities. The increased traffic, noise, and disruptions could negatively affect the university's academic environment and overall campus experience for students and staff. Amenity impacts (such as noise pollution and loss of tranquillity) on existing residents & negative effects on the character and identity of the area. The grasses found (long established through the site's use for agriculture and recreation) aid carbon sequestration, which is significant in tackling climate change and reaching net zero targets. Site is noted as biologically important and a bio-diversity alert, with Bluebells which are found here are a protected species. Access into the site cannot be achieved without destroying green space. The science park is considered to have expanded enough already. Subject to retention of the areas of woodland, this site may be a better alternative to development of the Keele golf course site</p>	
<p>This site is one identified (amongst others in the locality) whose development could impact upon Thistleberry.</p>	
<p>Stoke-on-Trent City Council - strategic employment site. Given the functional economic area our respective Council's share, the City Council would in principle support such a development but would encourage end uses which provide better quality, higher paid and secure jobs than those that are currently on offer, in the main, in existing warehousing development.</p>	
<p>A through road from KL15 should not be created, as it would encourage huge amounts of traffic from the Keele sites (as well as the university) to and from the M6, for example, via Sutherland Drive and other roads in the Westlands area.</p>	
<p>If development were to take place & it may be preferable to develop here rather than on the Keele golf course, it is vital that a green woodland</p>	

area is kept between KL15 and Paris Avenue estate. The woods (such as Flagstaff Plantation, but not only that part) can be seen from miles around including the other side of the town, and therefore they must be protected not only for nearby residents, but to maintain the character and environment of Newcastle as a place overlooked by green hills all along the western side	
No exceptional reason for Green Belt boundary changes.	
The combination of SP11, TB19, SP13 and KL15 will lead to a huge new conurbation.	
The science park has expanded enough	
Concerns over infrastructure provision	
Loss of green / open space	
Loss of a greenfield site	
National Highways - The site is likely to have an impact on the Strategic Road Network (SRN) in terms of traffic. The immediate SRN junctions likely to be impacted are: M6 J15; A500 (Queensway) / A34 roundabout	
Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.	
Key that woodland area is kept between KL15 and Paris Avenue estate.	
Allocation of the site would lead to the destruction of wildlife and habitat	
Allocation of the site would lead to the demise of ancient woodland.	
Natural England - Reiterating those comments submitted previously to the Local Plan Issues & options consultation, the site includes areas that are priority habitat- i.e. deciduous woodland, and The Butts and Hands Wood which is listed as Ancient & Semi-Natural Woodland. Also adjacent to	

Rosemary Wood Site of Biological Importance, Barker's Wood and Hands Wood and Pie Rough Biodiversity Alert Site. Potential for air quality impacts on designated sites. Potential impact on best and most versatile agricultural land.	
Concerns regarding the impact on the A525	
The increased traffic, noise, and disruptions could negatively affect the university's academic environment and overall campus experience for students and staff.	
Potential loss of best and most versatile land	
Comment from Keel University. Supportive of the vision and site KL15 which can bring forward the site as an exemplar of sustainable development. Committed to working to ensure that the objectives of the site are achieved.	
Impact upon Public Rights of Way	
Trees that line the A525 should be kept.	
Opposition to the allocation of this site from a developer interest with a headline assessment undertaken & advocacy presented for an alternative development proposal for an area of Land at Madeley Heath incorporating a Planning Statement and a Transport assessment.	
Development offers a generational opportunity for regional scale growth which could provide a step-change in the Borough's employment offer that supports the knowledge-economy and which will significantly increase job numbers, job quality and job choice. However, the growth of Keele University and its Science Park must be supported by a sustainable spatial strategy. This must include the release of further land in the University Growth Corridor	
Encouraging university staff to be based in the Borough by the provision of better-quality homes will reduce the numbers commuting from across the region and contribute to the prosperity of the local economy, helping to support the viability of the urban centre of nearby Newcastle under Lyme. Given the campus' location, it is recognised that this would require	

<p>some Green Belt release in and around the Keele University area to create new properties and this would be supported, subject to the requirement that 30% of the housing total comprises affordable housing.</p>	
<p>Keele University is an internationally recognised centre for research and scholarship, it is also seen as a pioneer in the development of green energy and green technology. Within the Borough the University is one of the main employers and its contribution to the local economy is substantial. If the University is to continue to grow, it should have access to development space. Potential for high value industry & jobs to be established in specialist roles such as engineering, design & digital enterprises.</p>	
<p>Keele University is committed to working with the Council and other stakeholders in bringing forward the allocated site as an exemplar of sustainable development.</p> <p>The University agrees that development should be masterplan led and should maximise the benefit of sustainable transport links and the Smart Energy Network Demonstrator and is fully committed to working with other landowners to realise these objectives.</p> <p>Plans should take on board the need to create a more accessible and inclusive Public Transport Network, moving away from the East/West lineage of the existing system, and using the Local Plan to open up links to the North and South of Keele University, supporting more circular public transport solutions that link the Urban Villages to core employment sites and amenities.</p> <p>The University contends that there would be limited conflict with the five purposes of Green Belt identified the NPPF. Keele is a village, and the proposals would not therefore involve the sprawl of a large built-up area or the coalescence of existing towns. The proposals involve a limited release of countryside which is clearly defined and viewed in the context of existing built development to the east and west. This is not a valued</p>	

<p>landscape for the purposes of the NPPF. The proposals will not affect the historic core of Keele Village and will not prejudice urban regeneration within Stoke on Trent, which has its own separate employment allocation. This approach is considered far more sustainable than pushing the Borough's employment and housing requirements to settlements outside the Green Belt, which are significantly less well equipped to deal with the pressures that it brings. Although there may be arguments for an equal distribution of opportunity, consideration needs to be given to the wide impact of a distributed solution. Focusing development around existing infrastructure which can be sustainably enhanced to support both housing and economic growth should be given priority</p>	
<p>Keele Parish Council have worked with the University on the development of the Keele Neighbourhood Plan alongside the University's Masterplan. Support is given to the University's ambitions for growth over the period covered by the Local Plan, and the aim to serve as a hub for technological business development in the area. It is believed this is exactly the sort of development the Borough needs, and therefore do not object to the extension of the Science Park into Green Belt, but caution is urged owing to previous growth rates.</p>	

83. FDLP TK30 (Strategic Location)

Summary of Main Issues Raised	How the main issues have been taken into account
<p>United Utilities - TK30 (along with a number of other sites) is on the periphery of the area of operation of United Utilities. Development here may result in the connection of a large amount of flows into a small wastewater pumping station that is believed to pumps northwards. Offset distances from utility apparatus may be required. If this site is to be allocated, they would wish to work with the site promoter to ensure that the point of connection is agreed and to ensure that any necessary upgrades to infrastructure are co-ordinated with the delivery of development. It is requested that this be addressed in the Local Plan's site-specific requirements (should allocation continue to be pursued) including, as appropriate, any in the wider area. It may also be the case that the site promoter intends to connect to assets owned and operated by Severn Trent rather than United Utilities.</p>	<p>The site is not proposed to be allocated in the Final Draft Local Plan.</p>
<p>Stoke-on-Trent City Council - strategic employment site. Given the functional economic area our respective Council's share, the City Council would in principle support such a development but would encourage end uses which provide better quality, higher paid and secure jobs than those that are currently on offer, in the main, in existing warehousing development.</p>	
<p>Historic England - consider impact on Wedgewood Monument Grade II listed.</p>	
<p>Natural England - If this site is considered for release and allocation the following should be taken into account:</p> <ul style="list-style-type: none"> • The site includes areas that are priority habitat- i.e. deciduous woodland • Part of the site is agricultural land classification grade 3 and potentially best and most versatile land. • Potential for air quality impacts on designated sites. • Adjacent to Bignall End Coal Yards Site of Biological Importance. 	
<p>National Highways – The site is likely to have an impact on the Strategic Road Network (SRN) in terms of traffic. The immediate SRN junctions likely to be impacted are:</p>	

<p>M6 J16; A500 / Alsager Rd; A500 / A34 / Newcastle Road roundabout (Talke Interchange); A500 / A527</p> <p>Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed to determine the extent of their potential impacts on the operation of the SRN in the area.</p>	
<p>Cheshire East Council - Whilst recognising that the plan is not proposing to allocate the site at this stage, there is a lack of sufficient evidence or information to enable meaningful consideration of the planning merits or otherwise of the site. The following was highlighted:</p> <ul style="list-style-type: none"> - Concerns about the impact of this site on the capacity of the A500 and the junction of the A500/B5472/A531 roundabout. A transport assessment would be required to consider what mitigation is needed. The council would also require this assessment to consider the impacts of its proposed A500 widening scheme (to a dual carriageway) and, if this is shown to address forecast problems, there would be a policy requirement to contribute towards the council's costs of delivering this project. - The assessment should also consider, in conjunction with National Highways, how the operation of the B5078 Radway Green Road/Junction 16 of the M6 is impacted by these development proposals. - An assessment should be undertaken to consider how access to this employment site could be enhanced by public and sustainable transport from Alsager, Crewe, Sandbach and Congleton including demand projections. - An assessment of the highway impacts at the junction of the B5077/A5011 should also be undertaken. 	

<p>This site would require a degree of offsite mitigation. It is not entirely clear as to how this site would be accessed. The only existing bus service (route 4A) uses the Talke Road which goes over the A500 and does not seem like an obvious way to access TK30. It would be a deviation for the 4A to access this site as this route is already part of a larger complicated network of services (3, 3A, 4, 4A).</p>	
<p>Traffic (including A500 & A34 congestion which national audits highlight as at near capacity) & noise pollution issues would be worsened. Significant increases in HGV traffic and more issues associated with the use of existing routes as rat-runs.</p> <p>Road surfaces are in a poor condition (worsened by excess weight vehicles), with many narrow local roads making traffic flow more difficult, particularly for emergency vehicles and public transport. Limited or no crossing points exists. Access and egress via junctions will become a lot more difficult and dangerous. Traffic calming measures are already in place at certain points.</p> <p>Previously stated objections from the Highways Authority for much smaller residential proposals are highlighted.</p> <p>Public transport provision has been reduced & timetables are often affected by traffic congestion, especially during school term-time.</p> <p>Public right of way & cycle route impacts. Increase road users would make it dangerous for horse-riders which is a popular pastime and valuable to the local economy.</p> <p>More off-road parking would need to be provided if development were to take place.</p> <p>Road safety measures should be implemented, such as at the chicanes in Talk Pits towards Kidsgrove on Deans Lane & Cedar Road.</p>	

<p>Access routes into the site are questioned as to their suitability.</p> <p>While TK30 is proposed as a mixture of employment and/or housing, this is acceptable in general terms if access is from or near the A500 and not Deans Lane, since the traffic effect of the latter on the centre of Red Street would be completely unacceptable. The proposal shows a gap from Deans Lane for the path to the Wedgwood Memorial; this gap should be much wider so as to provide a better view of the hill and the development area to the south-east of the memorial should not come so close to the memorial.</p>	
<p><i>Social infrastructure:</i></p> <p>GP & dental (particularly for NHS) appointments are problematic/impossible to obtain. Reference to a recently closed GP practice (Waterhayes). Will a new pharmacy be established & how will any new services be staffed?</p> <p>Available school places across the age range are limited or at capacity. Current class sizes are also at maximum levels advised, with buildings in a poor state of repair. The creation of a new school would require the support of Staffordshire County Council. Retention of the former Hilltop school is suggested as it may be required should development take place.</p> <p>Policing pressures.</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Run off from roads after heavy & sustained rainfall, with excess water being released from drains.</p> <p>The sewage network is not capable of coping with the increased demands from new development.</p> <p>Impact of development on groundwater and surface water contamination, allied to water supply difficulties of existing residents, noting issues that have arisen previously.</p>	

<p><i>Biodiversity:</i> Risk of irreversibly damaging ecosystems, disrupting delicate habitats, and contributing to the loss of biodiversity.</p> <p>The proximity of the proposals will affect the local nature reserve and ancient woodland of Parrots Drumble. Impacts could include: Trampling and vegetation wear, soil compaction and erosion, contamination (including nutrient enrichment (for example from dog fouling), as well as an increase in litter and a greater risk of fire. Corridors, including those local wildlife groups and Staffordshire Wildlife Trust helped established, could be harmed.</p> <p>The European Hedgehog is protected against intentional harm and consultation needs to be made with local rescue charities and organisations to properly assess the damage caused.</p> <p>Other species highlighted include: Wild rabbits, bats, badgers, newts, lapwings, frogs, toads, field mice, butterflies, foxes, red kites, skylarks, woodpeckers, sparrow hawks</p>	
<p><i>Character:</i> There will be impact through either the loss or damage to local listed buildings and the conservation area boundary at Talke. Red St Monument (& its retention) is significant to the community. Attention is also drawn to the dry-stone walling running along the entirety of Crown Bank.</p> <p><i>Deliverability:</i> Representation FDLP5025 (considered as part of Table 4 Strategic Locations) submitted on behalf of Harworth's Group in promoting the site's development provides extensive detail on aspects including: Vision document, indicative proposed masterplan, ecology & landscaping, highways access appraisal, heritage briefing note, geo-environmental desk study, note on socio-economic benefits, ecology and landscaping combined technical note.</p>	

<p>Opposition to the allocation of this site from a developer interest with a headline assessment undertaken & advocacy presented for an alternative development proposal for an area of Land at Madeley Heath incorporating a Planning Statement and a Transport assessment</p>	
<p><i>Other</i></p> <p>The scale of development is disproportionate to the size of the existing communities, as a small semi-rural, historic village, with a significant elderly population (also noting the Local Plan's settlement & retail centre hierarchies). The proposed developments would be overbearing, out of scale and out of character compared with existing developments in the area. There is also the potential that it coalesces settlements.</p> <p>Services & facilities are very limited, with Red Street comprising of a pub, church, a butchers and community centre. The post office and a shop have been lost in the recent past, with protection sought for those that remain, especially as there are no current plans for any further provision detailed in the Local Plan.</p> <p>The Borough's population is in decline, negating the need (& desirability) for the extent of new homes & employment highlighted. Existing warehouses remain empty including in Cheshire East, North Staffordshire & the Potteries and the recent permission at Chatterley Valley offers substantial further provision. Compared to AB2, this site (owing to it being less large) may be the least-worst option.</p> <p>The Government's housing numbers are only advisory & lower density development in the Green Belt is viewed to be against national policy. Extant permissions and recent over-supply should mitigate against increased development pressures.</p> <p>There have been several schemes progressed: Parkhouse Industrial Estate, High Carr Industrial Estate, residential estates at Waterhayes, Mitchels Wood, Badgers Croft, Friesian Gardens, Moss Grove and the very</p>	

recent Wedgwood View which collectively means no further extensive development should be required.

Loss of greenbelt land & wider impacts on openness, as well as urbanisation effects and population density increases. Exceptional circumstances for development have not been justified and the associated five purposes of Green Belt (as identified in the NPPF) have not been fully addressed. Permanence is integral to this. Conflicts with other aspects of Government policy such as food security, ground conditions & pollution and environmental protection.

Recent PM & Ministerial statements assert the brownfield first approach.

Construction of houses on greenbelt land will lead to the loss of natural buffers that help mitigate the impact of climate change. These areas act as carbon sinks, absorbing and storing carbon dioxide, while also helping to regulate temperature and reduce the risk of flooding.

Green Belt contributes to the overall physical and mental well-being of communities, promoting healthier lifestyles, providing outdoor recreation opportunities and fostering a sense of pride & identity.

Preserving greenbelt land also serves to safeguard the communities' collective heritage and ensure a high quality of life for present and future generations.

Alternative solutions should be explored, promoting sustainable urban planning (including focusing on smaller, affordable housing options to create a more balanced community including for single & elderly people, and building at higher densities nearest the main centres), as well as investing in brownfield redevelopment, existing areas (such as run-down parks) & bringing empty homes back into use. There are a significant number of brownfield sites available throughout the area, including in

<p>Stoke on Trent, whose development would help enhance the look of the area. Only a small proportion of sites identified to date in this locality are brownfield opportunities. Utilising mechanisms such as compulsory purchase are highlighted.</p> <p>A smaller scale proposal (less than 300 homes) may be more palatable. Adequate provision for parking should also be made.</p> <p>Permanent loss of (high grade) agricultural land.</p> <p>High pressure gas mains are located here.</p> <p>Health & safety concerns of construction, particularly for the young & elderly.</p> <p>Spoiling of natural or existing contours and/or destroying traditional field patterns.</p> <p>Smells & odours from Walley's quarry (Silverdale) are an amenity issue. Increased development will worsen air quality.</p> <p>Damage to the landscape means that there will be a general loss of visual amenity for all residents of Talke and Talke Pits.</p> <p>Loss of privacy & natural light.</p> <p>Increased light & noise pollution.</p> <p>Whilst affordability issues are recognised, how would the type of homes that could be built address this?</p> <p>Quarried areas within the site could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity.</p>	
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<p>Identified open space strategy sites should be retained.</p> <p>The wellbeing of the community should be prioritised in decisions that affect the natural environment.</p> <p>If the proposals were to be advanced, they would contravene the UN's 17 Global Goals for Sustainable Development.</p> <p>Mining legacies including shafts and an identified Coal Authority 'High Risk Area'. Potential for damage to existing properties to occur through ground disturbance & exacerbating subsidence. British Geological Survey evidence of earthquake activity.</p> <p>Property values will be negatively affected.</p> <p>Changes in living & working practices will alter the design and function of new homes. Automation will influence the type of employment that could be offered, and the longer term need for warehouse/lower skilled roles.</p> <p>Collaborative dialogue should take place with community members, environmental experts, and relevant stakeholders, to find innovative and sustainable solutions that balance the need for housing with the stated imperative of preserving green spaces. Consultation (including the drop-in events, notification methods, timeframes for response & general awareness) to date has not been easy to engage with.</p>	
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84. FDLP AB12 Land East of Diglake Street

Summary of Main Issues Raised	How the main issues have been taken into account
Concerns over proposed access arrangements and secondary access is not appropriate (including concerns over visibility)	The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.
Likely to increase traffic volume around the site and through the village. On street car parking is an issue	
The condition of the local road network is an issue	
Impact of reduced bus services need to be considered	The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.
Concerns over impact on existing infrastructure / amenities provision. Lack of infrastructure capacity to deal with the site -Schools -Doctors / Dentists	
Local empty shops and pubs should be converted into residential accommodation	
Specific concerns over access to the site from Diglake Street	The detailed site requirements for the site include access to the development via Diglake Street which is considered to be achievable. The site includes the provision of parking area and contributions towards off-site highway improvements to support the delivery of the site.
Disagree with scale of proposals and associated impact	
Close to the Diglake Mine	
Impact on agricultural land	The site requirements include the need for a Heritage Impact Assessment and the strengthening of existing hedgerows on the site alongside the provision of a landscape buffer.
Flora, fauna and wildlife impact	
Noise, light and other pollution concerns	
Flooding concerns	The site requires a sequential approach within the site to direct development to areas at lowest risk of flooding in the site alongside being an appropriate distance from sewers and associated infrastructure. The Plan is supported by an infrastructure delivery plan and the site policy requires contributions towards the capacity of local schools, health facilities and improvements to Albert Street / Bignall End Playground play facilities.
The site is ransomed and incapable of delivering safe and satisfactory access.	
Close to the Wedgewood Monument	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	
To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Provision for elderly population in village – bungalows etc?	

Staffordshire County Council - The Highway Authority would raise concern with the outlined access strategy. I can confirm that the site has sufficient road frontage on Diglake Street to create an access however there are off-site access issues that will need to be fully addressed in regard to on-street parking on Diglake street and intensification of use of the Diglake St/B5500 junction. Access to the field is presently taken from the B5500, however it is of insufficient width in its current form to serve the proposed development unless it can be improved. Preference would be for the development to be served via the higher order road (B5500).	
Nature reserves such as Parrots Drumble will be greatly affected by any proposals	
GB study 2020 deemed site has a strong contribution to the Green Belt. The site will have impacts on Green Belt purposes	
Agricultural Grade 3 farmland	
Green Belt impacts including urban sprawl	
Bungalows should be provided.	
Roads in Audley are often subject to flooding, building on greenfield will increase flooding	
Impact on landscape	
Change of bus services	
Loss of open space	
Concern over the capacity of local utilities and infrastructure including sewage etc.	
Historic England - No nearby heritage designated assets.	
Impact on the character and appearance of the area.	
United Utilities - Various sewer assets and associated combined sewer overflow pass through this site which will be a constraint to development.	

85. FDLP AB15 Land North of Vernon Avenue

Summary of Main Issues Raised	How the main issues have been taken into account
Likely to increase traffic volume through the village. Traffic safety will be compromised. Concerns over access into the site.	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The detailed policy requirements include access to the site being identified, via Vernon Street.</p> <p>The site has been reduced in number from 40 in the First Draft Local Plan to 33 in the Final Draft Local Plan. The policy for the site requires financial contributions to improvements in the capacity of schools and health facilities. The policy requirements for the site have also identified the need for landscape and heritage work to be undertaken to ensure the site is not intrusive in significant views from the surrounding area. The policy requirements provide for an appropriate distance from the sewer.</p>
Impact of the site's proximity to Diglake Disaster	
Impact of reduced bus services need to be considered	
Concerns over impact on existing infrastructure provision. Lack of infrastructure capacity to deal with the site including health, education, sewage, gas pressure and other facilities	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	
Audley already has the 10th highest incidence of asthma and chronic obstructive airways disease within Staffordshire; the highest for any of the rural practices. This is despite our smoking incidence being below the England average. To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Agricultural Grade 3 farmland	
Provision for elderly population in village – bungalows etc?	
Road on Vernon Avenue is in poor condition, concern over car parking and increased traffic from development will cause this to worsen.	
Will new development be in keeping with existing housing?	
Allocation of Green Belt land contradictory to government's recent statements	
Natural England - This is adjacent to a traditional orchard according to our records and this should be taken into consideration.	
Bungalows and homes suitable for older people should be provided	
Impact on local nature reserves including Parrots Drumble	

Impact on loss of wildlife, flora and fauna	
Flood risk concerns, including surface water	
Amenity impacts concerns	
Ground stability concerns	
Concerns over the loss of character and appearance of the local area.	
Concerns over impact and proximity to Conservation Area and Wedgewood Monument	
Concerns over loss of amenity areas and outdoor spaces	
Cumulative impacts of homes proposed in Audley	
Landscape impacts and on character and appearance	
Concerns over parking provision in the village	
Sites should be located close to existing centres and community facilities and should not lead to the coalescence between Audley Parish Settlements.	
Climate change impacts	
Brownfield sites should be prioritised.	
Pollution impacts, light, noise etc.	
Historic England – no nearby heritage assets	
There are more suitable brownfield sites in Stoke and Crewe	
United Utilities - Sewer passes through site.	

86. FDLP AB32: Land Nursery Gardens Audley

Summary of Main Issues Raised	How the main issues have been taken into account
The Nursery Gardens entrance into the site is not available to the public	The site has been removed from the Final Draft Local Plan.
Concerns over access into the site.	
Likely to increase traffic volume through the village - A traffic survey is required before the site can be allocated.	
Impact of reduced bus services need to be considered	
Concerns over impact on existing infrastructure provision. Lack of infrastructure capacity to deal with the site.	
Object to loss of Green Belt	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	
Audley already has the 10th highest incidence of asthma and chronic obstructive airways disease within Staffordshire; the highest for any of the rural practices. This is despite our smoking incidence being below the England average. To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Object to loss of Green Belt. Green Belt study 2020 deemed site has a strong contribution to the Green Belt	
Agricultural Grade 3 farmland	
Provision for elderly population in village – bungalows etc?	
Site was previously considered as a graveyard but planning permission was not granted because water table is too high	
Allocation of Green Belt land contradictory to government's recent statements	
Park Lane is too narrow to support a development this size (AB32+AB33)	
If planning permission is granted, what guarantees do we have that the drainage to our property will be maintained in good order during the continuance of any works? (We have previously had foul drainage	

discharging from sewer hole covers on our property until United Utilities re-laid a length of the drain in development area AB32.	
Bungalows should be provided.	
The hedge where access is being suggested is owned by a resident, how will the council ensure the access does not affect land not owned by the developer?	
Park Lane is too narrow to support a development this size (AB32+AB33)	
Site is near Wedgewood Monument and Audley Conservation Area	
Ground is unstable	
Close to site of Diglake disaster	
Flood risk concerns, including surface flooding	
Site is near Parrots Drumble	
Amenity impacts	
Concerns over impacts on character and appearance of area	
Concerns over climate change impacts	
Impacts of flora, fauna and wildlife	
Impact on trees and hedgerows	
Cumulative impacts of sites in Audley	
Noise, air and light pollution	
Any development proposed should be small, family accommodation and homes suitable for the elderly.	
Staffordshire County Council - Masterplan led development appropriate from an access strategy perspective. Off-site highway improvements are likely to be required in Park Lane to support AB32 & AB33. Master plan to be supported with a Transport Assessment.	
Historic England – no nearby designated assets	
Should develop brownfield sites	
Loss of open space	
Destruction of traditional field patterns and hedges	

United Utilities - Sewers pass through this site which will need to be taken into consideration.	
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87. FDLP AB33: Land Off Nantwich Road / Park Lane, Audley

Summary of Main Issues Raised	How the main issues have been taken into account
Likely to increase traffic volume through the village - A traffic survey is required before the site can be allocated.	The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.
Traffic safety and access concerns	
Concerns over the state and quality of the road network	
Impact of reduced bus services need to be considered	The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.
Concerns over infrastructure. Lack of existing / proposed infrastructure capacity to deal with the site including education, health, sewage, utilities etc	
Object to loss of Green Belt / Greenfield land	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	The site has been considered through the Green Belt Assessment (Part 4). The exceptional circumstances for Green Belt release are contained within the Plan Strategy Housing Topic Paper [ED031].
Audley already has the 10th highest incidence of asthma and chronic obstructive airways disease within Staffordshire; the highest for any of the rural practices. This is despite our smoking incidence being below the England average. To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Object to loss of Green Belt. Green Belt study 2020 deemed site has a strong contribution to the Green Belt	
Agricultural Grade 3 farmland	The site policy asks that the layout of the site be landscape led and limited, in terms of intrusion. The site policy requires several assessments including a heritage impact assessment, the consideration of sewers and flooding, a land contamination assessment alongside contributions towards improvements to local play areas and contributions to improvements to local schools and health facilities.
Provision for elderly population in village – bungalows etc?	
Site was previously considered as a graveyard but planning permission was not granted because watertable is too high	
Allocation of Green Belt land contradictory to government's recent statements	The Council believes that the allocation for residential development will contribute positively to the Borough's housing supply. It offers an opportunity to deliver a range of housing types and tenures in a sustainable location. The Council will work to ensure that the development is well designed and integrated into the surrounding
A development of this scale would change the rural character of Audley.	
Park Lane is too narrow to support a development this size (AB32+AB33)	
Site is near Wedgewood Monument and Audley Conservation Area	

Ground is unstable	environment, minimising any adverse impacts on local residents and the environment.
Close to site of Diglake disaster	
Flood risk concerns, including surface flooding	
Site is near Parrots Drumble	
Amenity impacts	
Concerns over impacts on character and appearance of area	
Concerns over climate change impacts	
Impacts of flora, fauna and wildlife	
Impact on trees and hedgerows	
Cumulative impacts of sites in Audley	
Noise, air and light pollution	
Any development proposed should be small, family accommodation and homes suitable for the elderly.	
Staffordshire County Council - Masterplan led development appropriate from an access strategy perspective. Off-site highway improvements are likely to be required in Park Lane to support AB32 & AB33. Master plan to be supported with a Transport Assessment.	
Historic England – no nearby designated assets	
Should develop brownfield sites	
Loss of open space	
Destruction of traditional field patterns and hedges	

88. FDLP BL18: Clough Hall, Talke

Summary of Main Issues Raised	How the main issues have been taken into account
Sport England - Not demonstrated that this playing pitch is surplus to requirement or replacement provision is to be provided in line with NPPF paragraph 99.	The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.
Object to loss of wildlife on site	
No infrastructure to support development (doctors, schools etc)	
The field holds water that runs down the A34 and is marshy throughout all seasons. Poor drainage around area, the development will exacerbate these issues and lead to worse flooding on Park Avenue	The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.
Too much development in Talke will put a strain on amenities	
Increased traffic increases pollution and decreases air quality. Road is not wide enough.	
Access constraints - It would be dangerous to have a road exiting on to the A34. Beech drive is a narrow and windy road and cars are already parked on pavements.	The site allocation wording has confirmed that the access into the site is expected from the A34 Newcastle Road. The site policy has also required contributions towards improvements to Talke Signals.
Site includes some significant old woodland and cannot be dismissed as either brownfield or denuded land from intensive agriculture.	
United Utilities - There is flood risk at this site. It is critical that any masterplanning of this site takes full account of this flood risk and we recommend that this is better understood as soon as possible.	
National Highways - Further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National highways should be consulted in this process.	The site requires masterplanning to retain and enhance tree coverage on the site and provide for appropriate buffers to local ecological sites but also the presence of any flood risk on the site.
During school hours, cars park on both side of Clough Hall Road to pick children up from school, causing traffic to build. This site therefore contradicts policy IN2	
Why can't BL18 be reinstated as a playing pitch? This has more community value than housing. Object to loss of open space.	
Not enough signage on BL18 to indicate this was a potential allocation in the Draft Local Plan	The site requires several assessments including a noise, coal mining risk assessment, land contamination assessment amongst others.
Land is prone to flooding, drainage and surface water impacts	
	The site requires the retention of playing pitches on site alongside contributions towards improvements to local schools and health facilities.
	The Council believes that the allocation for residential development will contribute positively to the Borough's housing supply. It offers an opportunity to deliver a range of housing types and tenures in a

Popular recreation and dog walking site	sustainable location. The Council will work to ensure that the development is well designed and integrated into the surrounding environment, minimising any adverse impacts on local residents and the environment.
Talke does not have many green spaces.	
Natural England - This site includes parts of Sites of Biological Importance. We are unable to provide specific advice, but we would advise that if these allocations will cause adverse impacts on these sites they should be deleted as allocations in line with paragraph 174 of the NPPF.	
Officers at consultation event said that the entrance for any houses built would not be from Newcastle Road. This means that the entrance would be from somewhere from the surrounding estate. This would lead to an increase of traffic / air pollution/ traffic noise on what has always been a quiet estate.	
Object to loss of Green Belt / open countryside	
Site is in close proximity to Wedgewood Monument / heritage implications (proximity to Talke Conservation Area)	
Concerns over loss of character	
Climate change impacts	
Site does not meet the sustainability appraisal requirements	
Council's SHELAA does not support the allocation of the site	
Staffordshire County Council - Cycle and pedestrian connectivity to the A34 will need to be considered within any Master Plan. Master plan to be supported with a Transport Assessment.	
Historic England – no nearby designated heritage assets	
Opportunities for local employment has reduced.	
Local sewage infrastructure is not appropriate for development	
Light, air quality and noise pollution	
Lack of services in the local area	
Concerns over impact on local character, landscape. Concerns regarding urban sprawl	
Contrary to objectives in the sustainability appraisal	
Object to the loss of Greenspace on Clough Hall Playing Field.	

Impacts of Peacock Hay Road and new warehousing on local traffic levels etc.	
No connecting bus routes	
BL18 has several springs.	
Lack of employment opportunities in Kidsgrove and the surrounding area	
Concerns over sewage infrastructure at Red Bull Sewage Plant)	
Concerns over construction impacts	

89. FDLP BL24: Land Adjacent 31 Bunbury Street, Talke

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i> Concern regarding height and potential overlooking / overshadowing of adjacent houses</p> <p>Impact on air quality - loss of clean fresh air and potential emissions and dust from construction activities that could affect air quality and residents' health (particularly taking into account the elderly population / ex-mining population with high incidences of Asthma and COPD)</p> <p>Impact on the health and wellbeing of the local community - concerns about how the construction projects will affect their access to services and overall quality of life (especially given the village has a high elderly population)</p> <p>Increased noise pollution disturbing the peace and tranquillity of the area</p>	<p>The site has been removed from the Final Draft Local Plan.</p>
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - schools, GP surgeries (Talke and Kidsgrove), NHS dentists and shop/s Loss of open space Suggestion that the former Hilltop School site should be retained in case a school with a playing field is needed</p>	
<p><i>Transportation:</i> Staffordshire County Council - Banbury Street has restricted geometry to accommodate increase of two-way traffic as a result of development. Off-site highway mitigation works will be required to support the proposal.</p>	

<p>Other Transport concerns</p> <p>Concerns regarding increase in traffic - increased noise and disturbance, congestion, on-street parking problems, accidents, difficulties with residents getting in and out of driveways and impact on the bus service</p> <p>Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic – in particular, the roundabouts at the end of the village and throughout the Talke residential road network</p> <p>National traffic audits indicate that the A34 and A500 are already at almost full capacity</p> <p>Increase in heavy vehicles associated with construction works leading to further congestion and potential safety hazards</p> <p>The nearby major arterial routes of the A34, the A500 and the M6 already regularly cause unacceptable traffic difficulties in Talke, causing large numbers of vehicles, including HGVs, to divert through the village when there are accidents on / the M6 is closed. Additional houses will only exacerbate these problems</p> <p>The new housing sites will result in large numbers of people commuting from the sites, which is contrary to the Council's objective 'to reduce the need to travel'</p> <p>Regarding the site access, Banbury Street is sometimes the only parking available for houses on the main road / access will be difficult with the A34 at capacity</p> <p>Increased competition for / inadequate parking provision at retail outlets in the Talke Pits, Butt Lane and Kidsgrove areas</p> <p>Parking during construction will be a major issue</p>	
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Inadequate public transport	
<p>United Utilities - We are particularly concerned by site reference BL24. Our modelling data identifies a level of flood risk which is a significant volume which could affect a large section of this small site. This flood risk must be better understood before progressing this allocation further. In the absence of information which confirms that this site is developable either in whole or part, we must register an objection to the allocation of this site.</p> <p>United Utilities - Sewer passes through this site, in addition, we have noted a modelled risk of sewer flooding.</p>	
<p><i>Biodiversity:</i> Loss of green space, trees, hedgerows and natural habitats to a variety of wildlife (including hedgehogs, bats and hunting ground to buzzards) = net loss in biodiversity</p> <p>Detrimental impact on nature reserves and ancient woodland</p> <p>Request that local wildlife groups and owners of the conservation area be involved in assessing the potential impacts</p>	
<p><i>Character:</i> The amount of development proposed is out of proportion with the size of the village and would overwhelm it – adversely affecting the identity and special character of the historic village, rendering it a semi-urban sprawl</p> <p>Detrimental impact on the open landscape, scenic beauty, natural contours and rural setting of the historic village</p> <p>Impact on heritage assets, including the Wedgewood Monument (Grade II listed); Talke Conservation Area; the Roman road from Chesterton to Chester; dry stone walling along Crown Bank; listed buildings on Coal Pit Hill; and historic coaching inns</p>	

Historic England - No nearby designated heritage assets.	
<i>Green Belt:</i> Loss of Green Belt land / loss of openness of the Green Belt	
<i>Deliverability / Viability:</i> Site likely to be highly contaminated due to former industrial uses which could affect viability (asbestos found during demolition)	
<i>Other:</i> The level of development proposed in the Talke area is not in line with the settlement hierarchy Brown field sites in more urban areas where amenities are better, and infrastructure is already in place should be looked at first Loss of agricultural land Increased risk of disturbance to mine shafts and potential subsidence issues, in particular with the volume and weight of even more traffic Concern regarding land slippage in relation to adjacent houses	
Potential contamination of ground or surface water due to construction on previous mining operations	
Increased flood risk caused by run-off and damaged pipes from excess traffic	

90. FDLP BL32: Land at Congleton Road, Butt Lane

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Concern regarding height and potential overlooking / overshadowing of adjacent houses</p> <p>Impact on air quality - loss of clean fresh air and potential emissions and dust from construction activities that could affect air quality and residents' health (particularly considering the elderly population / ex-mining population with high incidences of Asthma and COPD)</p> <p>Impact on the health and wellbeing of the local community - concerns about how the construction projects will affect their access to services and overall quality of life (especially given the village has a high elderly population)</p> <p>Increased noise pollution disturbing the peace and tranquillity of the area</p> <p>[Loss of views / devaluation of property]</p>	<p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements).</p> <p>Policy SA1 considers a host of technical requirements on the site. The policy requires appropriately vehicular connectivity via Knowles View and contributions to improvements to Talke Signals. The policy requires contributions towards improvements in the capacity of local schools and health facilities to support the Infrastructure Delivery Plan.</p>
<p><i>Social infrastructure:</i></p> <p>Insufficient / overloaded infrastructure - schools, GP surgeries (Talke and Kidsgrove), NHS dentists and shop/s</p> <p>Loss of open space</p> <p>Suggestion that the former Hilltop School site should be retained in case a school with a playing field is needed</p>	
<p><i>Transportation:</i></p> <p>Staffordshire County Council - Off-site highway works required within Knowles Way to provide a suitable means of access to site.</p>	

Staffordshire County Council - Pedestrian connection to be provided between Knowles View and A34 Congleton Road	
<i>Water, drainage & flood risk:</i> United Utilities - Sewer passes through this site. Record of Sewer Flooding in the Vicinity of the Site: External Hydraulic Flooder? Circa 75m. In addition, we have noted a modelled risk of sewer flooding.	
<i>Biodiversity:</i> Loss of green space (the last open green space between the houses), trees, hedgerows and natural habitats to a variety of wildlife (including hedgehogs, bats, owls, foxes, bees, butterflies, other insects and a variety of bird species) = net loss in biodiversity Detrimental impact on nature reserves and ancient woodland Request that local wildlife groups and owners of the conservation area be involved in assessing the potential impacts	
<i>Character:</i> The amount of development proposed is out of proportion with the size of the village and would overwhelm it – adversely affecting the identity and special character of the historic village, rendering it a semi-urban sprawl Detrimental impact on the open landscape, scenic beauty, natural contours and rural setting of the historic village Impact on heritage assets, including the Wedgewood Monument (Grade II listed); Talke Conservation Area; the Roman road from Chesterton to Chester; dry stone walling along Crown Bank; listed buildings on Coal Pit Hill; and historic coaching inns Historic England - No nearby designated heritage assets.	
<i>Green Belt:</i> Loss of Green Belt land / loss of openness of the Green Belt	

<p><i>Deliverability / Viability:</i></p> <p>The proposed access is across a ransom strip put in place (by Taylor Wimpey) to prevent the existing estate becoming a through-route / access to this site</p> <p>Site likely to be highly contaminated due to former industrial uses which could affect viability (asbestos found during demolition)</p>	
<p><i>Other:</i></p> <p>The level of development proposed in the Talke area is not in line with the settlement hierarchy</p> <p>Brown field sites in more urban areas where amenities are better, and infrastructure is already in place should be looked at first</p> <p>Loss of agricultural land</p> <p>Increased risk of disturbance to mine shafts and potential subsidence issues, in particular with the volume and weight of even more traffic</p> <p>No housing need - there is sufficient new housing already available in the area (estate currently under construction on West Avenue only half a mile away)</p> <p>Looks like a rational proposal given the existing infrastructure</p>	
<p>Concerns regarding increase in traffic - increased noise and disturbance, congestion, on-street parking problems, accidents, difficulties with residents getting in and out of driveways and impact on the bus service</p> <p>Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic – in particular, in the High Street / Crown Bank / Swan Bank thoroughfare, all through the Talke residential road network and the roundabouts at the end of the village</p>	

<p>National traffic audits indicate that the A34 and A500 are already at almost full capacity</p> <p>Increase in heavy vehicles associated with construction works leading to further congestion and potential safety hazards</p> <p>The nearby major arterial routes of the A34, the A500 and the M6 already regularly cause unacceptable traffic difficulties in Talke, causing large numbers of vehicles, including HGVs, to divert through the village when there are accidents on / the M6 is closed. Additional houses will only exacerbate these problems</p> <p>The new housing sites will result in large numbers of people commuting from the sites, which is contrary to the Council's objective 'to reduce the need to travel'</p> <p>Access via Knowles View will mean the Mitchell Gardens estate will become a through-road with an extra 60-100 vehicles a day. Mitchell Gardens was not designed to be a through-road, the roads are already too narrow, and parking is a major problem / access will be difficult with the A34 at capacity</p> <p>Increased competition for / inadequate parking provision at retail outlets in the Talke Pits, Butt Lane and Kidsgrove areas</p> <p>Inadequate public transport</p>	
<p>Potential contamination of ground or surface water due to construction on previous mining operations</p> <p>Increased flood risk caused by run-off and damaged pipes from excess traffic</p>	

91. FDLP BL8: Land Adj to roundabout West Avenue, Kidsgrove

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health & wellbeing:</i> Impact on air quality - loss of clean fresh air and potential emissions and dust from construction activities that could affect air quality and residents' health (particularly taking into account the elderly population / ex-mining population with high incidences of Asthma and COPD)</p> <p>Impact on the health and wellbeing of the local community - concerns about how the construction projects will affect their access to services and overall quality of life (especially given the village has a high elderly population)</p> <p>Increased noise pollution disturbing the peace and tranquillity of the area</p>	<p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements).</p> <p>Policy SA1 considers a host of technical requirements on the site. The policy requirements support a sequential approach to flood risk to direct development to areas of the site at lowest risk of flooding alongside assessments on coal mining, land contamination and other technical matters. The policy requires contributions to improvements to Talke Signals and to local schools / health facilities.</p>
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - schools, GP surgeries (Talke and Kidsgrove), NHS dentists and shop/s</p> <p>Loss of open space</p> <p>Suggestion that the former Hilltop School site should be retained in case a school with a playing field is needed</p>	
<p><i>Transportation:</i> Concerns regarding increase in traffic - increased noise and disturbance, congestion, on-street parking problems, accidents, difficulties with residents getting in and out of driveways and impact on the bus service</p> <p>Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic – in particular, the High Street / Crown Bank / Swan Bank thoroughfare, the junctions and roundabouts at the end of the village and throughout the Talke residential road network</p>	

<p>National traffic audits indicate that the A34 and A500 are already at almost full capacity</p> <p>Increase in heavy vehicles associated with construction works leading to further congestion and potential safety hazards</p> <p>The nearby major arterial routes of the A34, the A500 and the M6 already regularly cause unacceptable traffic difficulties in Talke, causing large numbers of vehicles, including HGVs, to divert through the village when there are accidents on / the M6 is closed. Additional houses will only exacerbate these problems</p> <p>The new housing sites will result in large numbers of people commuting from the sites, which is contrary to the Council's objective 'to reduce the need to travel'</p> <p>Increased competition for / inadequate parking provision at retail outlets in the Talke Pits, Butt Lane and Kidsgrove areas</p> <p>Inadequate public transport</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Potential contamination of ground or surface water due to construction on previous mining operations</p> <p>Increased flood risk caused by run-off and damaged pipes from excess traffic</p>	
<p><i>Biodiversity:</i></p> <p>Loss of green space, trees, hedgerows and natural habitats to a variety of wildlife (including hedgehogs and bats) = net loss in biodiversity</p> <p>Detrimental impact on nature reserves and ancient woodland</p>	

Request that local wildlife groups and owners of the conservation area be involved in assessing the potential impacts	
<p><i>Character:</i></p> <p>The amount of development proposed is out of proportion with the size of the village and would overwhelm it – adversely affecting the identity and special character of the historic village, rendering it a semi-urban sprawl</p> <p>Detrimental impact on the open landscape, scenic beauty, natural contours and rural setting of the historic village</p> <p>Impact on heritage assets, including the Wedgewood Monument (Grade II listed); Talke Conservation Area; the Roman road from Chesterton to Chester; dry stone walling along Crown Bank; listed buildings on Coal Pit Hill; and historic coaching inns</p> <p>Historic England - No nearby designated heritage assets.</p>	
<p><i>Green Belt:</i></p> <p>Loss of Green Belt land / loss of openness of the Green Belt</p>	
<p><i>Deliverability / Viability:</i></p> <p>Site likely to be highly contaminated due to former industrial uses which could affect viability</p>	
<p><i>Other:</i></p> <p>The level of development proposed in the Talke area is not in line with the settlement hierarchy</p>	

<p>Brown field sites in more urban areas where amenities are better, and infrastructure is already in place should be looked at first</p> <p>Loss of agricultural land</p> <p>Increased risk of disturbance to mine shafts and potential subsidence issues, in particular with the volume and weight of even more traffic</p> <p>Looks like a rational proposal given the existing infrastructure</p>	
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92. FDLP CH13: Castletown Grange, Douglas Road

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Transportation: Staffordshire County Council - Rationalisation of access arrangement required to support redevelopment of the site (</p>	<p>The council has carefully considered the feedback received on the proposed allocation CH13: Castletown Grange, Douglas Road, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>Transportation and Access: In line with Staffordshire County Council's recommendation to rationalise access arrangements, the site-specific policy for CH13 requires a comprehensive Transport Assessment (TA) to be submitted with any planning application. The TA must demonstrate that the proposed development will not adversely affect the safety, capacity, or efficiency of the surrounding highway network. The policy also specifies that the development will be accessed from Douglas Road, ensuring a safe and efficient connection to the existing road network.</p> <p>Flood Risk and Environmental Enhancement: The updated Strategic Flood Risk Assessment (SFRA, 2024) confirms that a portion of the site is at risk of flooding. Policy SE3 'Flood Risk Management' guides development in flood risk areas, requiring a Flood Risk Assessment (FRA) for any development proposal on the site. The FRA must demonstrate that the development will not increase flood risk elsewhere, that it will be safe for its intended lifetime, and that it incorporates appropriate mitigation measures.</p> <p>The council also supports the EA's recommendation to explore opportunities for flood risk and ecological betterment. The site-specific policy for CH13 encourages the incorporation of Sustainable Drainage Systems (SuDS) and other measures to enhance water quality and biodiversity wherever feasible.</p>
<p>Water, drainage & flood risk: Environment Agency - Based upon our Flood Map for Planning, part of the proposed site falls within Flood Zone 3 and 2 of the Ashfield Brook, designated ordinary watercourse. The Brook would appear to go into culvert upstream of the site, with flooding potential resulting from blockage of the culvert. Further assessment / modelling should inform any application for development of this site and a sequential approach taken to the siting of development to ensure it remains out of the high-risk area.</p> <p>Environment Agency - Opportunities for flood risk and ecological betterment / water quality enhancement should be fully investigated and implemented.</p>	
<p>Character: Historic England - No nearby designated heritage assets</p>	

	<p>Heritage Considerations:</p> <p>Historic England confirmed that there are no designated heritage assets in the immediate vicinity of the site. However, the Council recognises the importance of considering the wider historic environment. Policy SE9 'Historic Environment' guides development in relation to heritage assets, ensuring that new development is sensitive to the character and significance of the surrounding area.</p>
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93. FDLP CH14: Maryhill Day Centre, Willmott Drive

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Transportation:</i> Staffordshire County Council - Any access off Willmott Court will require off-site highway works to widen the carriageway and improve geometry of turning head.</p> <p>Staffordshire County Council - Access via Wilmot Drive raises no concerns</p>	<p>The Council has carefully considered the feedback received on the proposed allocation CH14: Maryhill Day Centre, Willmott Drive, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>Transportation and Access:</p>
<p><i>Character:</i> Historic England - No nearby designated heritage assets</p>	<p>The site-specific policy for CH14 incorporates the feedback from Staffordshire County Council regarding access arrangements. The Council recognises that access via Willmott Court would require off-site highway works to widen the carriageway and improve the geometry of the turning head. To address this potential constraint, the policy specifies that the development will be accessed from Willmott Drive, which raises no major highway safety concerns. This ensures that the development can be integrated into the existing road network without requiring significant off-site improvements.</p>
<p><i>Other:</i> Existing amenities makes this a sensible proposition</p>	<p>Character and Amenity: Historic England confirmed that there are no designated heritage assets in the immediate vicinity of the site. The Council will, however, continue to monitor the site for potential archaeological discoveries during the development process and will ensure that any development on the site is sensitive to the character of the surrounding area in accordance with Policy SE9 'Historic Environment'.</p> <p>The feedback received also highlighted that the site's location near existing amenities makes this a sensible proposition for redevelopment. The Council agrees that the site is well-suited for residential development due to its proximity to shops, services, and public transport. This aligns with the Plan's objective to promote sustainable development and to create well-connected communities.</p>

	<p>The Council believes that the allocation of CH14: Maryhill Day Centre, Willmott Drive, for residential development is appropriate and will contribute positively to the Borough's housing supply. The final site allocation and associated policy requirements reflect a thorough consideration of the feedback received and the Council's commitment to delivering sustainable development that respects the local context.</p>
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94. FDLP CT1: Land at Red Street and High Carr Farm

Summary of Main Issues Raised	How the main issues have been taken into account
National Highways - Further assessment required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would like to be consulted on this.	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Policy SA1 requires, for major development schemes, the completion of a construction management plan to manage construction activities associated with the development.</p> <p>The Final Draft Local Plan is supported by a detailed policy approach which confirms access arrangements into the site. It also requires the production of a masterplan and design code for the site which considers the design quality of the site and recognition of transition between the higher density urban and rural landscape. The masterplan / design code is also to consider impacts on the Wedgewood Monument. The policy requires a drainage strategy and other, supporting assessments, including a coal mining risk assessment.</p> <p>The policy requires contributions towards the capacity of local schools and health facilities.</p>
Staffordshire County Council - Master plan to be supported with a Transport Assessment. The IDP and supporting strategic transport modelling must identify whether off-site highway improvements are required to support the major development. Gateway / speed reduction/ traffic calming scheme will be required on Talke Road to accommodate for change in built up residential area. Sustainable travel links and provision of adequate amenities /facilities and access to public transport to serve the scale of the development key consideration from an accessibility/sustainability perspective. Walking/ Cycling Audit required to demonstrate safe and suitable links are available / can be provided to support the scale of development. Infrastructure improvements required will be fully funded by the applicant.	
United Utilities - Further clarity on point of connection required. In Between UU and ST area of service for wastewater.	
Comment in support of the development by landowner. The rep sets out details of suitability, sustainability and deliverability and attaches a transport assessment.	
The area has many mine shafts. Concerns over subsidence and sinkholes.	
Infrastructure and services are not in place to support such a large development (schools, GPs, shops etc)	
Newcastle is drastically short of smaller houses for either first time buyers to get on the property ladder or older people looking to downsize	
Site contradictory to government statements regarding building on the Green Belt. Exceptional circumstances for Green Belt release has not been proven.	
Red street is edged by A34, A500 and M6 and at times traffic is diverted through Red Street.	

Red Street is narrow lanes and cannot accommodate the vehicle increase from development	Exceptional circumstances for Green Belt release are demonstrated in the Plan Strategy Housing Topic Paper {ED031}.
Disruption to residents due to scale of development	
The land is workable farmland/greenbelt with hundreds of mature trees and hedgerows which supports a business	
Abundance of wildlife on the site including European hedgehogs and lapwings which are released onto the site	
Site used recreationally by public	
Site is out of scale and character for the surrounding area	
Lack of public transport in area which will mean increased reliance on cars and therefore more pollution to area – contradictory to sustainable transport policies	
Access constraints at Bells Hollow	
Doubling the population of the area	
Poor drainage in the area.	
Poor impact on residents' mental health.	
Will the homes be affordable?	
Concern about effect of construction vibrations on older homes which are already compromised by traffic, having had tie-bars installed.	
The apartments in Crofters court will look out directly onto the new houses and offer no privacy for the new residents as the upstairs apartments will have a direct view into gardens and buildings.	
Effect on Wedgewood Monument and its setting.	
What is the need to build at Red Street when population is decreasing	
Development should be concentrated in urban areas.	
The site has access constraints and is questionable whether it can be developed.	
CPRE Staffordshire - We oppose the development of this agricultural land in the Green Belt. The fields support populations of snipe, an Amber List species that has undergone population decline in the UK.	
Brownfield sites should be developed first.	

Pollution, including noise and air pollution impacts	
Scale of the proposal is a concern	
Object to development due to impact on local character of the area and village feel	
The site is not sustainable and concerns over climate change impacts	
The site is in close proximity to employment development at Chatterley Valley	
A lot of development has also taken place in the local area	
Concerns over utilities connections including sewage connections	
Drainage and surface water flooding concerns	
Concerns over landscape impacts	
Concerns over construction impacts	

95. FDLP CT20: Rowhurst Close

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Social Infrastructure:</i> Chesterton settlement-wide issues highlighted: Insufficient / overloaded infrastructure - GP surgeries & NHS dentists, schools</p> <p><i>Transportation:</i> National Highways – The site is likely to have an impact on the Strategic Road Network (SRN) in terms of traffic. The immediate SRN junctions likely to be impacted are: AA500 / Alsager Rd; A500 / A34 / Newcastle Road roundabout; A500 / AA527; A500 / A5271. Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.</p> <p>Staffordshire County Council - Development to be supported with a Transport Assessment.</p> <p>Other transport High volumes of traffic within Chesterton, and whenever a road is closed due to road works, the surrounding areas become grid locked.</p>	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The policy requirements for CT20 seek to address a number of the comments received at regulation 18 stage, to consider matters such as the agent of change principle and the need for flooding, contaminated land and coal mining risk assessment.</p>
<p><i>Character:</i> Historic England - No nearby designated heritage assets.</p>	
<p><i>Other:</i> Considered that this proposed allocation should be extended to include an area referred to as White Rock (1.52ha area defined on a map, with specific developable areas highlighted). Technical reports to highlight the mitigation of ecology and contamination issues on the site are also provided. Arguments made as to open space accessibility improvements</p>	

<p>& the stance on Green Belt. Consequent amendments be made to Policy EMP1 & the Policies Map.</p> <p>Mining legacies.</p> <p>The site is a rational proposal given the existing infrastructure.</p> <p>CT20 is an appropriate employment site, but as it is clearly visible from Apedale Country Park, it should include trees that screen any buildings.</p> <p>Brownfield sites should be exploited to provide affordable housing and prior to developing on greenfield areas.</p> <p>Potential for developments to impact on the water supply, with reference to earlier schemes causing such problems for existing properties.</p> <p>Concerns over loss of biodiversity, impact on wildlife & landscape.</p> <p>Impact on Grade II Wedgewood Monument.</p>	
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96. FDLP KG6 William Road, Kidsgrove

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Historic England - No nearby designated heritage assets.</p> <p>United Utilities - Sewer passes through this site. In addition, we have noted a modelled risk of sewer flooding.</p>	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p>

97. FDLP RC8: Land at Liverpool Road

Summary of Main Issues Raised	How the main issues have been taken into account
Historic England - Cannot locate site.	The site is now a planning commitment (post March 2023), as reflected in Appendix 4 of the Final Draft Local Plan
United Utilities - Initial Site Assessment Record of Sewer Flooding in the Vicinity of the Site: RC8 - Land at Liverpool Road (Part of Birchenwood) Kidsgrove (Parcel 2)	
Question over the need for this site to be developed.	

98. FDLP KL13: Keele Science Park, Phase 3

Summary of Main Issues Raised	How the main issues have been taken into account
<p>National Highways - further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocations (where impacts on the operation of the SRN in the area are anticipated) be subject to consultation with National Highways, and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.</p> <p>The immediate SRN junctions likely to be impacted are M6/J15/A500 (Queensway) / A34 roundabout.</p> <p>Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.</p>	<p>The Council has carefully considered the feedback received on the proposed allocation KL13: Keele Science Park, Phase 3 during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to KL13 in the Final Draft Local Plan. Integral to these evaluations are the Site Selection Report and Assessments (ED029), the Strategic Housing and Employment Land Availability Assessment (ED006a), and the Strategic Transport Assessment (ED011). The Housing and Economic Needs Assessment 2024 (ED001) also serves to present more detail on the supply of employment land across the borough, and the specific contribution KL13 makes to this.</p> <p>Within the Final Draft Local Plan, KL13 has a discrete policy to set the parameters for its respective development (as part of Section 13 Site Allocations). This addresses a breadth of issues such as green infrastructure, access and heritage impacts that will serve to positively shape the proposals and mitigate as far as possible any consequent harm. A masterplan led approach will also be integral to delivery of the site, recognising the buildings that have been developed to date.</p>
<p>Natural England - • The site includes areas that are priority habitat- i.e. deciduous woodland, and The Butts and Hands Wood which it is listed as Ancient & Semi-Natural Woodland.</p> <ul style="list-style-type: none"> • Potential for air quality impacts on designated sites. • Potential impact on best and most versatile land. 	
<p>Site KL 13 is not in the Green Belt and is understood to deliver the identified need for Keele. As such, the Council have concluded that no further sites are required in Keele or the surrounding area during the plan period and hence no additional Green Belt release is necessary. Consider this to be an unsound approach as it does not follow the legal and procedural requirements of a sound plan which should be positively prepared, effective, justified and consistent with national policy, in particular identifying appropriate sites to endure over the whole plan period (NPPF paragraph 35). By selecting KL 13 in isolation, the strategy for delivery of development in Keele is not robust. Whilst we acknowledge that the NPPF seeks to protect Green Belt land as a matter</p>	

<p>of principle, new Local Plan documents must plan appropriately and ensure that Green Belt release creates robust and defensible boundaries for the future. In our view, the Councils proposed approach to allocate just one site in this locality for the entire plan period would leave the Local Plan in a perilous position, at risk of challenge and speculative future development to meet need at a later date</p>	
<p><i>Social infrastructure:</i> Existing pressures on schools (across the age ranges) & medical facilities (including GP & dental services) will be exacerbated significantly.</p> <p>The Local Plan must provide greater clarity on how the local infrastructure will be improved as a consequence of development.</p>	
<p>Staffordshire County Council – Masterplan to be supported with a Transport Assessment & Travel Plan.</p>	
<p>Transportation Should development occur, whilst there may be some capacity on existing bus services, there is going to be a requirement for additional services. If there is a proposed link road through to Keele university from site TB19, there could be an opportunity to provide a joined up public transport system which could serve the majority of new sites in and around Keele, thus providing a good sustainable option for local residents.</p> <p>Plans should take on board the need to create a more accessible and inclusive Public Transport Network, moving away from the East/West lineage of the existing system, and using the Local Plan to open up links to the North and South of Keele University, supporting more circular public transport solutions that link the Urban Villages to core employment sites and amenities.</p> <p>A through road from KL13 should not be created, as it would encourage vast amounts of traffic from the Keele sites (as well as the university) to</p>	

<p>and from the M6, for example, via Sutherland Drive and other roads in the Westlands area.</p> <p>The roads are already struggling to meet current needs and will not cope with the extra properties and people planned for this area.</p>	
<p><i>Character:</i></p> <p>Historic England – Whilst unclear on the exact site location, potentially there are no nearby designated heritage assets.</p>	
<p><i>Deliverability:</i></p> <p>Keele University is committed to working with the Council and other stakeholders in bringing forward the allocated site as an exemplar of sustainable development.</p> <p>The University agrees that development should be masterplan led and should maximise the benefit of sustainable transport links and the Smart Energy Network Demonstrator and is fully committed to working with other landowners to realise these objectives.</p>	
<p>Keele Parish Council – support Keele University's growth plans, and the details outlined in the University masterplan. As such, they are in favour of the continuing development of the existing Science Park (KL13) to support employment, and to bring high skilled jobs to the area.</p>	
<p><i>Other:</i></p> <p>Developing KL13 would seem sensible if absolutely required to meet housing and business needs, recognising that it is already partially developed. The close proximity of the observatory could be a negative aspect, however.</p> <p>The University contends that there would be limited conflict with the five purposes of Green Belt identified in the NPPF. Keele is a village, and the</p>	

proposals would not therefore involve the sprawl of a large built-up area or the coalescence of existing towns. The proposals involve a limited release of countryside which is clearly defined and viewed in the context of existing built development to the east and west. This is not a valued landscape for the purposes of the NPPF. The proposals will not affect the historic core of Keele Village and will not prejudice urban regeneration within Stoke on Trent, which has its own separate employment allocation. This approach is considered far more sustainable than pushing the Borough's employment and housing requirements to settlements outside the Green Belt, which are significantly less well equipped to deal with the pressures that it brings. Although there may be arguments for an equal distribution of opportunity, consideration needs to be given to the wide impact of a distributed solution. Focusing development around existing infrastructure which can be sustainably enhanced to support both housing and economic growth should be given priority.

By selecting KL 13 in isolation, the strategy for delivery of development in Keele is not robust. Whilst acknowledging that the NPPF seeks to protect Green Belt land as a matter of principle, new Local Plan documents must plan appropriately and ensure that Green Belt release creates robust and defensible boundaries for the future. It is considered that the Council's proposed approach to allocate just one site in this locality for the entire plan period would leave the Local Plan in a perilous position, at risk of challenge and speculative future development to meet need at a later date.

Development offers a generational opportunity for regional scale growth which could provide a step-change in the Borough's employment offer that supports the knowledge-economy and which will significantly increase job numbers, job quality and job choice. However, the growth of Keele University and its Science Park must be supported by a sustainable spatial strategy. This must include the release of further land in the University Growth Corridor.

The site being near two deciduous woods which it is suggested will likely contain bats (a protected species), with other wildlife impacts highlighted. Increase in traffic during & after construction. Impacts on existing residents including mental health & wider amenity concerns. The science park is considered to have expanded enough already.

This site is one identified (amongst others in the locality) whose development could impact upon Thistleberry.

Wider issues argued include: The concentration of housing in Keele is disproportionate to its scale; the number of recent permissions granted; development of Green Belt land will result in Silverdale and Keele merging into one large urban conurbation; proximity to Walley's quarry with associated air quality & pollution issues; natural springs being found; the number of empty homes in the Borough & student blocks within the university campus itself; vacant & derelict buildings in the town centre; reduced population figures in the 2021 census; Government statements on areas that should be the focus of development; recreational, biodiversity & public health value of Keele golf course in particular; covenants may restrict/limit development; increased carbon emissions impacts; contesting the Local Plan's sustainability appraisal assessments.

99. FDLP KS11: Knutton Community Centre

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - GP surgeries and NHS dentists</p>	<p>The Council has carefully considered the feedback received on the proposed allocation KS11: Knutton Community Centre during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to KS11 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The Council acknowledges the concerns raised regarding the potential impacts on infrastructure, transportation, flood risk and local character.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> • Social Infrastructure: The Council recognises the concerns raised about the capacity of existing social infrastructure to serve new housing. Financial contributions towards improving local health facilities, and local school capacity, is a requirement of Policy KS11, this would also be secured through Policy IN1 'Infrastructure,' considering the scale and impact of the development. • Transportation and Parking: Concerns about the impact of increased traffic and parking pressures on local roads have also been considered. Any future application on site is likely to require a Transport Assessment to assess any impacts on the road network, and KS11 states that access must be from Lower Milehouse Lane, this access should be designed to be safe for pedestrians and cyclists and the surrounding highway network. Policies IN2 'Transport and Accessibility' and IN3 'Access and
<p><i>Transportation:</i> Staffordshire County Council - Access Improvement scheme may be required to support redevelopment at the site.</p> <p>Staffordshire County Council - Development to be supported with a Transport Statement.</p>	
<p><i>Water, drainage & flood risk:</i> Concern regarding flooding at Lower Milehouse, 'the Whammy' open space and Black Bank</p>	
<p><i>Character:</i> Historic England - No nearby designated heritage assets</p>	
<p><i>Deliverability:</i> Aspire Housing confirm that it is their intention to submit a planning application for the affordable housing units on the site (& others within the Knutton Masterplan by the end of 2023).</p>	
<p><i>Other:</i> The site is a rational proposal given the existing infrastructure.</p> <p>Derelict & unfinished sites in Newcastle town centre and previous plans for regeneration not coming to fruition.</p>	
<p>Concerns regarding increase in traffic</p> <p>Existing road system already poorly maintained, with the new 'Wilmot Drive' estate still having no footpaths or tarmac on the roads.</p>	

	<p>Parking' guide development in relation to access, parking, and sustainable transport. Policy IN2 seeks to minimise the need to travel and maximise opportunities for sustainable and active transport modes. Policy IN3 sets out parking standards and requirements. Development proposals for the site will need to meet the requirements of these Policies.</p> <ul style="list-style-type: none"> • Flood Risk: The Council acknowledges concerns around flooding. KS11 requires a sequential approach to flood risk, directing development to areas of lowest risk and considering flood risk from all sources. Any future planning application will also need to demonstrate compliance with Policy SE3 'Flood Risk Management' and the Strategic Flood Risk Assessment ED013 (2024). Further flood risk assessment or modelling may be required at the application stage. • Heritage and Character: The site assessment has concluded there are no designated heritage assets in close proximity to the site. Any future development on the site will be expected to be sensitive to the character of the surrounding area, in accordance with Policy SE9 'Historic Environment', which protects non-designated heritage assets and their settings. Any application for development will also be required to prepare and submit a Design and Access Statement demonstrating how the scale, layout, appearance, materials, and access arrangements relate to the character of the surrounding area. • Deliverability and Affordable Housing: The Council welcomes Aspire Housing's intention to submit a planning application for the affordable housing units on site. This commitment demonstrates the site's deliverability for affordable housing and supports the Council's objective to increase the supply of affordable housing in the Borough. <p>The Council is confident that the allocation of KS11 for development strikes a balance between the need for housing and local concerns about</p>
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	greenspace, infrastructure, and transport. The site is deemed suitable for development, based on the assessment presented in the Site Selection Report.
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100. FDLP KS17: Knutton Recreation Centre

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - GP surgeries and NHS dentists</p>	<p>The Council has carefully considered the feedback received on the proposed allocation KS17: Knutton Recreation Centre during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to KS17 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The Council acknowledges the concerns raised regarding the potential impacts on infrastructure, greenspace, transport, flood risk, and local character.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Greenspace Impacts: The Council acknowledges the concerns about the loss of green space, including playing fields, and other amenities. The 2024 Playing Pitch Strategy (ED012a) identifies a need for playing pitch provision in the area and highlights a potential shortfall in the future. Recognising this need and the site's former recreational use, the Council will work with any applicant to explore opportunities to incorporate sports and recreational facilities, either on-site or through contributions to off-site facilities, in accordance with policy SE6: Open Space, Sport and Leisure. As this site comprises of previously developed land the main policy driver relating to the provision of green and blue infrastructure is SE14, which promotes the use of green infrastructure to protect, enhance and manage the natural and built environment. Policy SE4 'Sustainable Drainage Systems'
<p><i>Transportation:</i> Concerns regarding increase in traffic</p> <p>Existing road system already poorly maintained, with the new 'Wilmot Drive' estate still having no footpaths or tarmac on the roads.</p>	
<p><i>Water, drainage & flood risk:</i> Concern regarding flooding at Lower Milehouse, 'the Whammy' open space and Black Bank</p>	
<p><i>Character:</i> Historic England - No nearby designated heritage assets</p>	
<p><i>Deliverability:</i> Aspire Housing confirm that it is their intention to submit a planning application for the affordable housing units on the site (& others within the Knutton Masterplan by the end of 2023).</p>	
<p><i>Other:</i> Greenspace impacts, which would include loss of playing fields and other village amenities.</p> <p>Implications such as recreational use demands increasing for other areas in the locality, such as KS3, if this site were to be developed.</p> <p>If the scale of housing planned elsewhere (such as Keele golf course) is reduced, both sides of Blackbank road, on the edge of Knutton, could be used to meet the Borough's needs.</p> <p>The previously proposed plan of a village centre beside the High Street, adjacent to KS17, should be progressed.</p>	

<p>Derelict & unfinished sites in Newcastle town centre and previous plans for regeneration not coming to fruition.</p>	<p>requires major developments to incorporate sustainable drainage to manage surface water runoff, reduce flood risk, and contribute to the water quality and biodiversity objectives of the Local Plan. These policies should address concerns about biodiversity and flood risk and enhance the quality of green and blue networks in the urban area.</p> <ul style="list-style-type: none"> • Social Infrastructure: The Council recognises the concerns raised about the capacity of existing social infrastructure to serve new housing. Financial contributions towards improving local health facilities, and local school capacity, is a requirement of Policy KS17, this would also be secured through Policy IN1 'Infrastructure,' considering the scale and impact of the development. • Transportation and Parking: Concerns about the impact of increased traffic and parking pressures on local roads have also been considered. Any future application on site is likely to require a Transport Assessment to assess any impacts on the road network, and KS17 states that access must be from the High Street and Downham Road, this access should be designed to be safe for pedestrians and cyclists and the surrounding highway network. Policies IN2 'Transport and Accessibility' and IN3 'Access and Parking' guide development in relation to access, parking, and sustainable transport. Policy IN2 seeks to minimise the need to travel and maximise opportunities for sustainable and active transport modes. Policy IN3 sets out parking standards and requirements. Development proposals for the site will need to meet the requirements of these Policies. • Flood Risk: The Council acknowledges concerns about flooding at Lower Milehouse, 'the Whammy' open space, and Black Bank. KS17 requires a sequential approach to flood risk, directing development to areas of lowest risk and considering flood risk from all sources. Any future planning application will also need to demonstrate compliance with Policy SE3 'Flood Risk
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	<p>Management' and the Strategic Flood Risk Assessment (2024). Further flood risk assessment or modelling may be required at the application stage.</p> <ul style="list-style-type: none"> • Heritage and Character: The site assessment has concluded there are no designated heritage assets in close proximity to the site. Any future development on the site will be expected to be sensitive to the character of the surrounding area, in accordance with Policy SE9 'Historic Environment', which protects non-designated heritage assets and their settings. Any application for development will also be required to prepare and submit a Design and Access Statement demonstrating how the scale, layout, appearance, materials, and access arrangements relate to the character of the surrounding area. • Deliverability and Affordable Housing: The Council welcomes Aspire Housing's intention to submit a planning application for the affordable housing units on site. This commitment demonstrates the site's deliverability for affordable housing and supports the Council's objective to increase the supply of affordable housing in the Borough. <p>The Council is confident that the allocation of KS17 for development strikes a balance between the need for housing and local concerns about greenspace, infrastructure, and transport. The site is deemed suitable for development, based on the assessment presented in the Site Selection Report.</p>
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101. FDLP KS18: Land North of Lower Milehouse Lane

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - GP surgeries and NHS dentists</p>	<p>The Council has carefully considered the feedback received on the proposed allocation KS18: Land North of Lower Milehouse Lane, Knutton during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to KS18 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan ED029. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The Council acknowledges the concerns raised regarding the potential impacts on infrastructure, transportation and parking, flood risk, and local character.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> • Social Infrastructure: The Council acknowledges concerns about the capacity of existing social infrastructure, including GP surgeries and NHS dentists, to serve new housing. Policy IN1 'Infrastructure' allows for financial contributions towards necessary infrastructure improvements and the policy KS18 requires contributions towards local school and health facilities. These mechanisms, along with the collaborative approach to infrastructure delivery outlined in the IDP, will help to ensure that development is supported by adequate services and facilities. • Transportation and Parking: Concerns about the loss of the community car park, increased traffic, and the condition of the existing road network have been considered. Policy KS18 requires access to be taken solely from the High Street. Policy KS18 also
<p><i>Transportation:</i> Staffordshire County Council - Access via High Street only</p> <p>Staffordshire County Council - Redevelopment will result in the loss of community car park which may result in overspill of vehicles parking on street giving rise to a highway safety issue.</p> <p>Staffordshire County Council - Development will need to be supported with a Transport Note / Statement to consider this concern in detail.</p>	
<p><i>Water, drainage & flood risk:</i> Concern regarding flooding at Lower Milehouse, 'the whammy' open space and Black Bank</p>	
<p><i>Character:</i> Historic England - No nearby designated heritage assets</p>	
<p><i>Deliverability:</i> Aspire Housing confirm that it is their intention to submit a planning application for the affordable housing units on the site by the end of 2023</p>	
<p><i>Other:</i> Looks like a rational proposal given the existing infrastructure</p> <p>Concerns regarding increase in traffic</p> <p>Existing road system already poorly maintained, with the new 'Wilmot Drive' estate still having no footpaths or tarmac on the roads</p>	

	<p>requires that a Transport Statement accompany any planning application, demonstrating how the development will address traffic and parking impacts, including the potential loss of parking spaces and any potential highway safety issues arising from increased on-street parking. The Council may require further assessment of access and parking as part of any planning application. These requirements, along with the provisions of Policies IN2 'Transport and Accessibility' and IN3 'Access and Parking', aim to ensure that new development does not adversely affect the safety, capacity, or efficiency of the local road network or create unacceptable parking issues.</p> <ul style="list-style-type: none"> • Flood Risk: The Council acknowledges concerns about flooding at Lower Milehouse, 'the Whammy' open space, and Black Bank. Any future planning application will need to be informed by Policy SE3 'Flood Risk Management' and demonstrate how flood risks are addressed in line with the Strategic Flood Risk Assessment (2024). Further flood risk assessment or modelling may be required at the application stage. • Heritage and Character: Historic England has confirmed that there are no designated heritage assets in the nearby location, which the Council acknowledges. Any future development on the site will be expected to be sensitive to the character of the surrounding area, in accordance with Policy SE9 'Historic Environment', which protects non-designated heritage assets and their settings. Any application for development will also be required to prepare and submit a Design and Access Statement demonstrating how the scale, layout, appearance, materials, and access arrangements relate to the character of the surrounding area. • Deliverability and Affordable Housing: The Council welcomes Aspire Housing's intention to submit a planning application for the affordable housing units on site. This commitment demonstrates the site's deliverability for affordable housing and
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	<p>supports the Council's objective to increase the supply of affordable housing in the Borough.</p> <p>The Council is confident that the allocation of KS18 for development strikes a balance between the need for housing and local concerns around infrastructure, transportation and parking, flood risk, and local character. The site is deemed suitable for development, based on the assessment presented in the Site Selection Report.</p>
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102. FDLP KS19: Knutton Lane

Summary of Main Issues Raised	How the main issues have been taken into account
Concern over loss of garages / car park as they are used and valuable resource to local residents.	<p>The Council has carefully considered the feedback received on the proposed allocation KS19: Knutton Lane, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan. The site is allocated for residential development, enabling the delivery of new affordable homes in a sustainable location within the urban area.</p> <p>Addressing Concerns:</p> <ul style="list-style-type: none"> • Loss of Garages/Car Park and Highway Safety: The Council acknowledges the concerns raised about the loss of garages and parking spaces and the potential for increased on-street parking to create highway safety concerns. Policy IN3 'Access and Parking' sets out requirements for parking provision, ensuring that new development does not adversely affect the safety or efficiency of the surrounding highway network. In relation to KS19, a Transport Statement will be required to accompany any planning application, demonstrating that adequate parking can be accommodated on-site and that the development will not lead to unacceptable on-street parking or highway safety issues. • Tree Removal: The Council recognises the value of trees and their contribution to the environment. Policy SE11 'Trees, hedgerows and woodland' sets out requirements for the protection of trees and hedgerows. In relation to KS19, the Council will require the applicant to retain existing trees wherever possible and to provide appropriate replacement planting for any trees that are unavoidably lost. • Impact on Local Services and Infrastructure: The Council acknowledges concerns regarding the potential impact of new development on existing local services and infrastructure. The Infrastructure Delivery Plan (IDP) identifies the infrastructure needed to support new development and outlines a collaborative
Concern that removal of car park will raise highway safety concerns with more on street parking.	
Concern that trees would need to be removed to enable development.	
Concerns over the ability for existing local services and infrastructure to cope with new demand.	
Concern over increase to traffic and the ability of the existing road network to cope.	
Historic England - No designated heritage assets in the nearby location of this road.	
The proposed allocations that Aspire Housing have an interest in are as follows: KS11, KS17, KS18, KS19, delivering a total of 73 affordable dwellings. Aspire are currently working up planning applications for some of these sites.	

	<p>approach to delivery. In relation to KS19, the IDP identifies the need for contributions towards improvements to local schools and health facilities.</p> <ul style="list-style-type: none"> • Increased Traffic and Road Network Capacity: The Council recognises the potential impact of new development on traffic levels and the capacity of the existing road network. Policy IN2 'Transport and Accessibility' promotes sustainable transport modes and requires new developments to be designed to minimise traffic generation. In relation to KS19, a Transport Statement will be required to demonstrate that the development will not have a severe impact on traffic levels or road safety. • Historic Environment: Historic England has confirmed that there are no designated heritage assets in the immediate vicinity of the site. The Council will, however, continue to monitor the site for potential archaeological discoveries during the development process and will ensure that any development on the site is sensitive to the character of the surrounding area in accordance with Policy SE9 'Historic Environment'. • Affordable Housing Delivery: The Council is committed to delivering affordable housing to meet the needs of the Borough's residents. The proposed allocation of KS19 for affordable housing, to be delivered by Aspire Housing, contributes to this objective and aligns with the Plan's overall strategy for affordable housing provision. Aspire Housing's active involvement in developing this site and other sites within the Knutton area demonstrates a commitment to providing much-needed affordable homes in the Borough. <p>The Council believes that the allocation of KS19: Knutton Lane for residential development is appropriate and will contribute positively to the Borough's housing supply. The final site allocation and associated policy requirements reflect a thorough consideration of the feedback</p>
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	received and the Council's commitment to delivering sustainable development that respects the local context.
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103. FDLP KS3: Land at Blackbank Road

Summary of Main Issues Raised	How the main issues have been taken into account
Concern over the loss of valuable, well used recreational space for children, dog walkers, runner etc. The need is exasperated by the closure of the Rec Centre.	<p>The Council has carefully considered the feedback received on the proposed allocation KS3: Land at Blackbank Road, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments and the emerging evidence base for the Regulation 19 Local Plan, has informed the final site allocation and associated policy requirements. The Council acknowledges the concerns raised regarding the loss of open green space and the potential impact on existing infrastructure. However, the site is considered suitable for residential development due to its sustainable location and the need to deliver housing to meet the borough's housing requirements.</p> <p>Addressing Concerns about the Loss of Recreational Space:</p> <p>The Council understands the community's value of the open space at Blackbank Road for recreation. Policy SE6 'Open Space, Sports, and Leisure Provision' emphasises the importance of providing and protecting open space and requires an assessment to demonstrate that alternative provision of equal or greater quality, quantity, or accessibility is available before permitting development on existing open space. In relation to KS3, the site-specific policy for KS3 requires the provision of new public open space on-site, ensuring that the development contributes to meeting the local need for recreational space.</p> <p>Supporting the Development of Knutton Centre:</p> <p>The Council supports the feedback regarding the development of Knutton centre and the provision of a village centre. The allocation of KS3 for residential development will contribute to the creation of a more vibrant and sustainable community in Knutton and will support the provision of local services and facilities.</p> <p>Considering Alternative Sites:</p> <p>The Council acknowledges the feedback suggesting that development should be directed to Green Belt land further along Blackbank Road to retain the existing open space. However, the Council has considered a</p>
Support for the development of Knutton centre and provision of a village centre.	
Support to develop in the Green Belt further along Blackbank Road and retain this for recreation.	
Concerns over the ability for existing local services and infrastructure to cope with new demand.	
Concern over increase to traffic and the ability of the existing road network to cope.	
Staffordshire County Council - Development will need to be supported with a Transport Assessment. Speed Measurement survey on Blackbank Road will need to be undertaken due to speeding concerns.	
Historic England - No designated heritage assets in the nearby location of this road.	
Concerns that removal of the green space will exasperate existing major issues with flooding.	
Concerns over loss of habitat and impact on wildlife.	
Sport England - We are opposed to housing allocations on playing field sites, as they are not proven surplus to requirement or replacement provision is needed. They suggest that any loss of playing field sites should be informed by an updated Playing Pitch Strategy to determine if they should be retained to meet demand. If there is no quantitative need for the playing field land, mitigation may be needed to fund qualitative improvements. Sport England believes the policy is inconsistent with national planning policy and recommends that site-specific requirements include playing field sites require compliance with NPPF paragraph 99. KS3 Land at Blackbank Road - Site has been marked out (2 x adult 11v11 and 2 x Youth 11v11) and utilised by teams within the last 5 years and	

<p>identified within the Council's Playing Pitch Strategy with a site recommendation to protect and enhance. Site identified within a sub area where there is a future shortfall in provision for football, rugby and with cricket at capacity.</p>	<p>range of potential sites for allocation and has concluded that KS3 is the most suitable location based on factors such as accessibility, infrastructure capacity, and the need to minimise the impact on the Green Belt.</p>
<p>Aspire does not control KS3, however Aspire would be interested in delivering this site as either the sole developer or as an affordable housing partner to a private developer.</p>	<p>Addressing Concerns about Infrastructure and Traffic: The Council recognises the concerns raised regarding the capacity of existing local services and infrastructure and the potential impact of new development on traffic levels. The Infrastructure Delivery Plan (IDP) identifies the infrastructure needed to support new development and outlines a collaborative approach to delivery. In relation to KS3, the IDP identifies the need for contributions towards improvements to local schools, health facilities, and transport infrastructure.</p> <p>The site-specific policy for KS3 requires a Transport Assessment (TA) to be submitted with any planning application, demonstrating that the proposed development will not have a severe impact on traffic levels or road safety. In addition, a Speed Measurement Survey will be undertaken on Blackbank Road to address the concerns about speeding and to inform the design of any necessary traffic calming measures.</p> <p>Flood Risk Mitigation: The Council acknowledges the concerns that the removal of green space at KS3 could exacerbate existing flood risk issues. The updated Strategic Flood Risk Assessment (SFRA, 2024) has identified areas at risk of flooding, and the site-specific policy for KS3 requires a Flood Risk Assessment (FRA) to be submitted with any planning application to demonstrate that the development will not increase flood risk elsewhere and will be safe for its intended lifetime. The Council will work collaboratively with the applicant, the Environment Agency, and other relevant agencies to ensure that the development incorporates sustainable drainage and does not exacerbate existing flood risk issues.</p> <p>Heritage Considerations: Historic England has confirmed that there are no designated heritage assets in the immediate vicinity of the site, which the Council</p>

	<p>acknowledges. The Council will, however, continue to monitor the site for potential archaeological discoveries during the development process and will ensure that any development on the site is sensitive to the character of the surrounding area in accordance with Policy SE9 'Historic Environment'.</p> <p>Affordable Housing Delivery:</p> <p>The Council is committed to delivering affordable housing to meet the needs of the Borough's residents. The Council welcomes Aspire Housing's interest in delivering KS3, either as the sole developer or as an affordable housing partner, as this would contribute to the Plan's overall strategy for affordable housing provision.</p> <p>The Council believes that the allocation of KS3: Land at Blackbank Road for residential development is appropriate and will contribute positively to the Borough's housing supply. The final site allocation and associated policy requirements reflect a thorough consideration of the feedback received and the Council's commitment to delivering sustainable development that respects the local context.</p> <p>Aspire Housing's interest in delivering KS3, either as the sole developer or as an affordable housing partner, as this would contribute to the Plan's overall strategy for affordable housing provision.</p> <p>The Council believes that the allocation of KS3: Land at Blackbank Road for residential development is appropriate and will contribute positively to the Borough's housing supply. The final site allocation and associated policy requirements reflect a thorough consideration of the feedback received and the Council's commitment to delivering sustainable development that respects the local context.</p>
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104. FDLP LW53: Land Corner of Muckleston Wood

Summary of Main Issues Raised	How the main issues have been taken into account
Loggerheads is overdeveloped and has not seen an investment in infrastructure to accommodate (schools, bus links, doctors etc)	<p>The Council recognises concerns raised during the Regulation 18 consultation regarding the proposed allocation of LW53: Land Corner of Muckleston Wood in Loggerheads. The feedback has been carefully considered alongside the updated evidence base and the strategic objectives of the Regulation 19 Local Plan. The Council acknowledges the concerns regarding the impact of development on the village's character and existing infrastructure capacity. However, the site is considered suitable for residential development due to its potential to contribute towards meeting the Borough's housing needs, its location adjacent to the settlement boundary of Loggerheads, and the opportunity to secure significant infrastructure improvements to benefit the local community.</p> <p>Addressing Infrastructure and Service Concerns:</p> <p>The Council acknowledges concerns regarding the capacity of existing infrastructure and services in Loggerheads. The Infrastructure Delivery Plan (IDP) identifies the infrastructure needed to support new development and outlines a collaborative approach to delivery. In relation to LW53, the IDP identifies the need for contributions towards improvements to local schools, health facilities, and transport infrastructure. The Council will work with developers, Staffordshire County Council, and other relevant agencies to ensure that the development is supported by adequate infrastructure and that the necessary improvements are delivered in a timely manner.</p> <p>Responding to Traffic and Transport Concerns:</p> <p>The Council recognises concerns about the potential impact of new development on traffic levels and the ability of the existing road network to cope. Policy IN2 'Transport and Accessibility' promotes sustainable transport modes and requires new developments to be designed to minimise traffic generation. In relation to LW53, a Transport Assessment (TA) will be required to demonstrate that the development will not have a</p>
Loggerheads is woefully under provided for in sports and recreational facilities. There is no NEAP or MUGA or community centre.	
Poor visibility at Muckleston Wood Lane wood make junction dangerous	
Why does Loggerheads need to contribute such a large number of dwellings in the Local Plan (15% when the ward only represents 3.5% of the population)?	
Already houses being constructed and not sold- is there a need in Loggerheads?	
Site is against Loggerheads neighbourhood plan as would create harm to the character and rural landscape	
Site consists as best and most versatile agricultural land	
Increase in housing without proper employment or sustainable transport links closeby increases car use in loggerheads which increases pollution.	
Policy IN2 –a, b, c, e f cannot be applied to Loggerheads	
Previously described as unsuitable in SHELAA 2022 document – what has changed?	
Currently outside the village envelope.	
Similar arguments as Baldwins Gate so how can LW53 be accepted?	
NULBC are working with Shropshire Homes regarding LW53	
Lapwings are a protected species and use the land, so do bats.	
Sewage Treatment works are over capacity and are prone to flooding with heavy downpour	
Will there be any footpaths to safely connect pedestrians to the village centre?	
Only small numbers of additional homes on infill sites in Loggerheads should be allowed.	

<p>Stafford Borough Council - The proposed housing allocation at Loggerheads (LW53) could increase traffic on the B5026 towards Eccleshall and Stafford. Further information on this matter would be welcomed.</p>	<p>severe impact on traffic levels or road safety. The TA must also address the specific concerns regarding visibility at the junction of Mucklestone Wood Lane and the potential impact on traffic flow on the B5026 towards Eccleshall and Stafford, as raised by Staffordshire County Council. The Council is committed to working with the applicant and the County Council to develop appropriate mitigation measures to address these concerns.</p>
<p>Environment Agency - This site is also underlain by a Principal aquifer and is situated within SPZ3 (Bearstone abstraction) so is also within a sensitive location for controlled water receptors. SPZ3 is the area around a supply source within which all the groundwater ends up at the abstraction point. Therefore, any development that is proposed within this area will need to prevent deterioration of the abstraction source and protect controlled water receptors.</p>	<p>Balancing Growth with Landscape and Environmental Protection: The Council acknowledges that the proposed allocation of LW53 is not currently within the settlement boundary of Loggerheads and that the site comprises best and most versatile agricultural land. Policy PSD4 'Development Boundaries and the Open Countryside' guides development in the open countryside, ensuring that any new development is appropriate for its location and does not harm the character, appearance, or environmental quality of the countryside.</p> <p>The Council also recognises the need to protect and enhance the Borough's biodiversity. Policy SE8 'Biodiversity and Geodiversity' requires development to avoid adverse impacts on a range of features, including protected species. In relation to LW53, an appropriate assessment will be required to address the presence of lapwings and bats on the site and to identify appropriate mitigation measures.</p> <p>Considering Existing Housing Supply: The Council acknowledges concerns that Loggerheads is already overdeveloped and that there are existing houses being constructed and not sold. However, the Council is required to plan for the Borough's future housing needs and to ensure a sufficient supply of land to meet those needs throughout the plan period. The Council's assessment of housing need, as set out in the Housing and Economic Needs Assessment (2024), demonstrates that there is a need for additional housing in the Borough, and the allocation of LW53 contributes towards meeting that need.</p> <p>Addressing the Concerns of Loggerheads Parish Council:</p>

	<p>The Council recognises that the proposed allocation of LW53 is not in accordance with the Loggerheads Neighbourhood Plan. However, the Local Plan must take a strategic view of the Borough's development needs and, in some cases, may need to depart from Neighbourhood Plan policies to meet those needs.</p> <p>Addressing Environmental Concerns:</p> <p>The Council acknowledges the Environment Agency's concerns regarding the site's location within a Groundwater Source Protection Zone (SPZ3). Policy SE5 'Water Resources and Water Quality' requires development to avoid unacceptable impacts on water quality and to contribute positively towards the objectives of the Water Framework Directive (WFD). In relation to LW53, a detailed assessment will be required to address the potential impacts of development on groundwater and to identify appropriate mitigation measures to protect controlled water receptors.</p> <p>The Council will work with the applicant, the EA, and other relevant agencies to ensure that the development meets the requirements of Policy SE5 and does not adversely affect the groundwater environment. The Council also acknowledges the concerns regarding the capacity of the sewage treatment works and the risk of flooding during heavy rainfall.</p> <p>The updated Water Cycle Study (2024) assesses the capacity of existing infrastructure and the potential impact of new development. The Council will work with developers, Severn Trent Water, and other relevant agencies to ensure that the development is supported by adequate infrastructure and that the necessary improvements are delivered in a timely manner.</p> <p>The Council will require a comprehensive Flood Risk Assessment (FRA) to be submitted with any planning application for development on the site. The FRA must demonstrate how the proposed development will not increase flood risk elsewhere and will be safe for its intended lifetime, incorporating appropriate mitigation measures.</p>
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	<p>Addressing Specific Concerns about the Site:</p> <ul style="list-style-type: none"> • The site-specific policy for LW53 requires the provision of a safe footpath to connect pedestrians to the village centre. • The Council acknowledges that there are concerns about the level of development proposed for Loggerheads. However, the Council has carefully considered the distribution of development across the Borough, and the allocation of LW53 for 130 dwellings is considered appropriate based on the strategic objectives of the Plan. <p>The Council believes that the allocation of LW53: Land Corner of Mucklestone Wood for residential development is appropriate and will contribute positively to the Borough's housing supply. The final site allocation and associated policy requirements reflect a thorough consideration of the feedback received and the Council's commitment to delivering sustainable development that respects the local context.</p>
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105. FDLP LW87: Former Petrol Station, Eccleshall Road

Summary of Main Issues Raised	How the main issues have been taken into account
Loggerheads Parish - Due to its central location, LW87 should be retained as an employment site	The site is now a commitment (post March 2023) and included in Appendix 4 of the Final Draft Local Plan.
The site is underlain by a Principal aquifer and as its former land use is as a petrol station, any development would pose a high risk of pollution to controlled water receptors, in particular the groundwater. In addition, this site is situated adjacent to the Burnt Wood SSSI, which is a groundwater dependant terrestrial ecosystem and therefore, sensitive to changes in groundwater flow and quality.	
Would be suitable as a community facility	
Car parking issues along Eccleshall Road will be worsened with the development	
Air pollution levels from standing vehicles waiting to negotiate this junction are high which makes this site unsuitable for residential development	

106. FDLP MD29: Land North of Bar Hill

Summary of Main Issues Raised	How the main issues have been taken into account
Bar Hill has poor drainage - this has not been addressed.	<p>The Council has carefully considered the feedback received on the proposed allocation MD29: Land North of Bar Hill during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to MD29 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Drainage, Road Network, and Access: The Council acknowledges concerns about existing drainage issues on Bar Hill, the condition of the road, and potential traffic impacts from the proposed development. These concerns, alongside those raised by Staffordshire County Council and Madeley Parish Council regarding the safety and capacity of the road network and specific junctions, will need to be addressed through a Transport Assessment (TA) required by MD29. This TA must demonstrate that the development will not adversely affect the safety, capacity, or efficiency of the surrounding highway network and should propose specific mitigation measures, including junction improvements or road widening, where necessary. Policy IN2 'Transport and Accessibility' and policy IN3 'Access and Parking' will guide the assessment of transport and parking impacts, including requirements for sustainable transport modes and
Car park along Bar Hill making it more like a single road, there is also heavy agricultural machinery along the road regularly- the additional housing will add to the dangers already presented on this road	
Staffordshire County Council - Critical junctions identified may trigger the requirement for off-site highway mitigation works which will need to be fully funded by the applicant.	
Staffordshire County Council - Transport assessment required	
<p>Madeley Parish Council - The road network. There are two particularly dangerous elements of the road network, both of which are highlighted in the Neighbourhood Development Plan for Madeley. These are the junctions between Manor Road and Bar Hill and the Monument Junction between Keele Road and Newcastle Road. Any large-scale development within Madeley Parish would, by virtue of the contingent increase in road network usage, require significant upgrading to the junctions in question to ensure road safety was not compromised. It is for that reason that policy TRA1 in the Madeley Neighbourhood Plan requires this as a material consideration when considering potential housing developments.</p> <ul style="list-style-type: none"> The school system. All of the local schools from the two primary schools to the Secondary school are, already, oversubscribed. A further 150 houses would be likely to see an influx of 200 to 300 children into an already oversubscribed system. Consideration would need to be given to how these children can be appropriately educated within the current limited bounds. Drainage supplies. The local drainage supplies are, we understand, also already at or close to capacity. Consideration would need to be given and appropriate provisions incorporated as to how this could be expanded and accommodated for with an increase in housing provision. 	

<ul style="list-style-type: none"> • Additional considerations which would also need to be provided for include the already oversubscribed Doctors surgery, Dentist provision and limited range of local stores and other facilities. <p>The Parish Council are, also, concerned to ensure that the relevant housing need is met. The trend within Madeley Parish has been for developments of larger family houses to be constructed and provided for ownership and/or shared ownership schemes in respect of the provision for affordable housing elements. The Parish Council consider that the housing need in the area is for increased availability of social rental properties as families are finding themselves forced to leave the area due to a lack of availability of suitable properties which is detrimental to the development of family units within the Parish boundaries.</p>	<p>parking provision. Policy MD29 also requires that development provide details for surface water on site, this will help ensure that the development incorporates sustainable drainage and does not exacerbate existing flooding issues or negatively impact drainage in other areas.</p> <ul style="list-style-type: none"> • School System Capacity: The Council recognises the concerns about the capacity of local schools to accommodate the increased demand from new housing. The Infrastructure Delivery Plan (IDP) identifies the need for additional school places in this area of the Borough and, in line with Policy IN1 'Infrastructure', sets out the expectation for financial contributions towards education from new development. Policy MD29 requires a financial contribution towards improvements to the capacity of local schools and health facilities. This recognises that existing local schools are already oversubscribed and aims to ensure that adequate provision is made for new pupils generated by the development. The Council will work collaboratively with Staffordshire County Council, developers, and other relevant agencies to ensure that sufficient school places are provided to meet the needs of both new and existing residents. • Other Infrastructure and Service Provision: The Council acknowledges the feedback regarding the limited range of local shops and other facilities in Madeley and the pressure on existing services, including the doctors' surgery and dentist provision. The IDP identifies the need for additional infrastructure and services to support growth in the Borough, and Policy IN1 'Infrastructure' sets out the Council's approach to securing contributions towards necessary improvements from new development. These mechanisms, along with the collaborative approach to infrastructure delivery outlined in the IDP, will help to ensure that
<p>There are many comments regarding HS2 – are these still necessary to include?</p>	
<p>Agricultural land which can be put to better use than housing in Madeley</p>	
<p>Ownership Issues - the site is under the control of multiple landowners. This brings significant issues in relation to deliverability, as if even one of the landowners is resistant to the development, this can make the scheme unviable or prevent it coming forward altogether</p>	
<p>Infrastructure constraints in Madeley to accommodate an additional 150 houses (Schools,GPs etc).</p>	
<p>Bar Hill is separate from the rest of the village, so the site does not have good access to services and facilities.</p>	
<p>Madeley neighbourhood plan is specific in its aims to - maintain the much-valued rural feel of the parish, its distinctive historic character, the countryside setting and key views within the conservation area- this proposal contradicts this.</p>	
<p>Staffordshire County Council - The existing pedestrian footbridge over the railway line provides a more direct pedestrian route to the centre of Madeley where facilities and amenities are located. However, the</p>	

footbridge is of substandard width and condition to support major development	<p>the development is supported by adequate services and facilities. Policy MD29 requires access to the site via Bar Hill.</p> <ul style="list-style-type: none"> • Green Belt and Housing Need: The Council acknowledges the concerns about developing in the Green Belt, the council can confirm that this site is not located within the Green Belt. The Council has considered the feedback regarding the need for housing and the availability of brownfield sites and has concluded that there is a need for additional housing in the Borough, which the allocation of MD29 helps to address. The site's location, adjacent to the existing settlement boundary of Madeley, minimises encroachment into the open countryside and allows for a logical extension of the village. The Council recognises that some respondents consider the site to be separate from the rest of Madeley, but the Plan's spatial strategy aims to direct growth towards existing settlements to support their services and facilities and to create sustainable communities. • Madeley Neighbourhood Plan: The Council acknowledges the Madeley Neighbourhood Plan's objectives to maintain the rural feel of the parish and its distinctive historic character. While the allocation of MD29 may not fully align with those objectives, the Local Plan must take a strategic view of the Borough's needs. The Council has concluded that the benefits of allocating MD29 for residential development, including the provision of much-needed housing and the opportunity to secure significant infrastructure improvements for Madeley, outweigh the potential impact on the village's rural character. This approach also reflects the need to maximise opportunities to promote the creation of affordable housing, as set out in the NPPF. • Land Ownership and Deliverability: The Council acknowledges the potential challenges associated with multiple landowners; however, this is not a major planning consideration. The council will work with the applicant and landowners to ensure that the
There is no bus service supplying Bar Hill so people on MD29 will have to have a car to get about which contradicts policies around sustainable transport usage.	
Brownfield site of Madeley Manor should be considered before Green Belt	
Also, many of us bought houses on the assurance the land would not be built on because it was near to HS2.	
Support - A mini roundabout at Madeley A525/A531 junction would reduce many problems including air pollution at Meadows School.	

	<p>site can be brought forward for development in a timely and efficient manner.</p> <ul style="list-style-type: none"> • HS2 Considerations: While the initial feedback included comments about HS2, the Council considers these concerns to be outside the scope of the Local Plan. HS2 is a nationally significant infrastructure project, and its impacts will be addressed through separate processes and assessments. Sections of the HS2 route have now been cancelled. The Council will, however, work with relevant agencies to mitigate any local impacts of HS2 wherever possible. <p>The Council believes the allocation of MD29 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report.</p>
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107. FDLP NC13: Land west of Bullockhouse Road

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i> Loss of privacy, light / overshadowing, outlook and visual amenity</p> <p>Additional noise and dust associated with construction / construction vehicles</p> <p>Additional cars significantly increasing emissions / reduction in air quality</p> <p>Increased pollution (air, light and noise), all having a detrimental impact on the physical and mental health / wellbeing of residents</p> <p>Unclear where the local authority's targets to achieve clean air has been factored into the proposals / impact on the Air Quality Management Plan</p> <p>Increased air pollution adversely affecting the development of local children</p> <p>Increased odour from Walley's Quarry because of more waste being sent there</p> <p>Loss of green space would have a detrimental impact on the physical and mental health / wellbeing of residents (including obesity rates)</p> <p>[Loss of private views / devaluation of property]</p>	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Policy SA1 includes the requirement of a construction management plan being prepared for major development schemes.</p> <p>Policy SE12 'Amenity': This policy requires new development to be designed in a way that safeguards residential amenity from various sources of potential harm, including noise, light pollution, odour, traffic, and inappropriate development.</p> <p>Policy SE1 'Pollution and Air Quality': This policy requires new development to minimise air pollution and to address the cumulative effects of emissions from proposed development alongside other existing sources of air pollution. The policy promotes sustainable transport modes, encourages the use of low-emission vehicles, and supports the increased provision of electric vehicle charging infrastructure.</p>
<p><i>Social infrastructure:</i> Loss of open green / recreational space – the site, which enhances the natural and open setting of the adjacent children's playground, is used by many locals for recreational purposes making; public paths around the site enable local residents to observe wildlife and plant-life close-up</p>	

<p>The public footpath along the northern edge of the land would still enable locals to exercise and access the play area (there is no public access over the site itself)</p> <p>Insufficient infrastructure – doctors, dentists, nursery and school places are already oversubscribed; no banks, post office, shops (the closest are over a mile away), insufficient open spaces, leisure facilities and jobs</p> <p>Harriseahead school could be expanded but only by building on the playing field or the all-weather playground</p>	<p>Policy SE2 'Land Contamination': This policy requires assessment and remediation of contaminated land, including the consideration of the potential for flood events to exacerbate contamination risks.</p> <p>The site-specific policy requires a number of technical assessments to be submitted with any planning application, including:</p> <p>Land Contamination Assessment: The assessment must identify any potential risks from contamination and propose appropriate remediation measures.</p>
<p><i>Transportation:</i></p> <p>Staffordshire County Council – Any Master Plan will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority and a Travel Plan</p> <p>Staffordshire County Council – Footway improvements required along the site frontage</p> <p>Staffordshire County Council – Bus services limited therefore may require S.106 Contribution toward bus service improvements</p> <p>Other comments relating to transport from other parties</p> <p>The roads in the area, which are narrow with bad bends, in poor condition and often without pavements, were not designed for the type and volume of traffic they already carry (cars, HGVs, buses, tractors etc) and are already dangerous, with many residents already not able to exit their drives safely</p> <p>Bringing additional cars onto the local network (150-200 or 400-500 when combined with NC77), including construction-related vehicles, will increase congestion, noise, pollution, disturbance and reduce road safety</p>	<p>Flood Risk Assessment (FRA): The FRA must demonstrate that the development will not increase flood risk elsewhere and will be safe for its intended lifetime, incorporating appropriate mitigation measures.</p> <p>The Council will work with the applicant and the relevant agencies to ensure that the development is designed and built in a way that minimises any adverse impacts on amenity and the environment.</p> <p>Loss of Recreational Space and Public Footpaths:</p> <p>The Council understands the value of the site as a recreational resource, and the importance of maintaining public access to the countryside. Policy SE6 'Open Space, Sports and Leisure Provision' guides the provision of open space, and the site-specific policy requires the creation of new public open space within the development to compensate for the loss of existing open space. This new open space will be designed to provide opportunities for recreation and wildlife habitat and will be connected to the existing network of public footpaths, ensuring that residents continue to have access to the countryside.</p> <p>Capacity of School Places:</p>

<p>Existing traffic issues in the area include the junction of Pennyfields / High Street onto Bullocks House Road (hazardous bottleneck on a dangerous bend), Long Lane (rat-run), Bull Lane (rat-run), Colclough Lane (rat-run) and the roundabout at the end of Turnhurst Road (backed-up from Chell)</p> <p>The site is close to Thursfield Primary school which has very little parking is and becomes grid-locked at drop-off and pick-up times, with local pinch points, at the top of Pennyfields Road, through Newchapel village centre and past the school towards Long Lane / Chapel Lane, causing long tailbacks / delays</p> <p>Thursfield school is located opposite a virtual blind junction without pavements and the additional traffic in conjunction with the current heavy load would give great concern for serious accidents (in July 2023 a school child was injured in an accident)</p> <p>Concern regarding site access – roads narrow and difficult to see oncoming traffic, resulting in an unacceptable increase in risk to school children and other pedestrians</p> <p>The site is perfect for development, having direct access onto a straight stretch of main road</p> <p>Inadequate public transport – poor local bus services and Kidsgrove railway station a two-mile walk away – all resulting in reliance on cars</p> <p>Lack of support for public transport – insufficient bus shelters, inadequate parking at and closing of the ticket office at Kidsgrove railway station</p> <p>Inadequate other sustainable transport modes – lack of pavements and safe routes for cyclists and horse riders</p>	<p>The Council recognises that school places are currently in high demand in the area. The Infrastructure Delivery Plan (IDP) identifies the need for additional primary school places in this area of the Borough and includes provision for contributions from new development to help fund the necessary expansion. The site-specific policy requires a financial contribution towards the provision of additional primary school places, ensuring that the development does not place an undue burden on existing schools.</p>
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<p>A traffic survey must be undertaken at a time to provide an accurate representation of the existing levels of congestion (i.e. during term-time)</p> <p>Roads already hazardous in winter due to elevation / poor weather conditions (snow), particularly Pennyfields Road, which is very steep</p> <p>Insufficient school places locally will lead to children travelling further afield – resulting in more traffic on the roads</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>United Utilities – Various sewers pass through this site. There is a record of sewer flooding in the vicinity of the site, and we have noted a modelled risk of sewer flooding on the site</p> <p>Other comments on water, drainage and flood risk from other parties</p> <p>Negative impact on watercourses / water quality – the local sewage works is already often at capacity, sometimes leading to discharge into watercourses</p> <p>The local sewer system and road drainage on Bullocks House Road and High Street is old and already struggling to cope with rainwater-run off without any further capacity added; history of surface water flooding at Ian Road, Long Lane and Willowcroft Way in Harriseahead</p> <p>The site facilitates natural drainage, and its development would increase flood risk due to ‘run-off’</p> <p>The site is marshland and unsuitable for building – it is known to flood and there is regularly water lying on its surface following rainfall; it also potentially has an underground lake beneath it (it was historically used to collect water for coal slurry and the water never ran out)</p>	

<p>The site is at a lower level than Bullocks House Road and so may require a pump for drainage</p>	
<p><i>Biodiversity:</i></p> <p>Loss of trees and green space, resulting in diverse wildlife / habitat loss – a range of insects (butterflies, bees, ladybirds, wasps, dragonflies), bats, birds (sky larks, partridges, falcons, tawny/barn owls, kestrels, sparrowhawk, buzzards, kites) and mammals (squirrels, hedgehogs, rabbits, foxes, badgers)</p> <p>Loss of a natural wetland / marshland, which holds water in the spring and autumn, forming several small ponds that host a self-contained ecosystem of rare amphibious wildlife (crested newts, toads, frogs, lizards, grass snakes)</p> <p>Loss of a fine example of an established English meadow (95% of which have been lost), containing a wealth of biodiversity that is classed as ‘climax vegetation’, including rare native flora (wild orchids, yellow rattleweed, vetches and over 20 different / rare grasses)</p> <p>Loss of established English oak trees and ancient hedgerows which potentially are / should be protected under the Hedgerows Regulations 1997</p> <p>Concern that an up-to-date ecological survey has not been carried out</p> <p>Loss of carbon storage, cooling and shading, green network / opportunities for species migration, the protection of water quality and natural management of flood risk</p> <p>Attention drawn to Section 40 of the Natural Environment and Rural Communities Act 2006 – duty for local authorities to consider conserving biodiversity as an integral part of policy and decision-making</p>	

<p>Fake / new nature areas will be required to replace the natural ones being destroyed</p> <p>The site should be preserved as a wildlife / conservation area</p> <p>No habitat loss within 400 metres of the site</p>	
<p><i>Character:</i> Scale of development out of keeping with the semi-rural character of the village</p> <p>Out of character with the immediate area, which comprises development along Bullocks House Road which is only one to two houses deep</p> <p>Erosion of local character – the gap provided by NC13 helps to denote the historic village and character of the area – the sense of moving from one village to another. Loss of this space would have a detrimental impact on the special character of each village, resulting in housing approximately 2 miles long from Turnhurst Road to Chapel Lane and an unbroken conurbation / urban sprawl from Tunstall and all the Potteries towns, all the way to Mow Cop, with the outlying villages swallowed-up</p> <p>The character and appearance of the land and the separation between Newchapel and Harriseahead would be lost forever</p> <p>Loss of the sense of space and place afforded by the countryside view across NC13 towards Wales, which is extremely important to local people and indicates the transition as you travel north into a more agricultural / rural landscape</p> <p>Loss of character and quality of the countryside – the only real piece of greenbelt land adjacent to the road</p> <p>Detrimental impact on the small close-knit / community feel of the village</p>	

<p>No intrusion into the open countryside, as the site is an infill site within the village – the Green Belt boundary has already been breached with residential building on the eastern side of Bullocks House Road</p> <p>The land is no use for farming and is poorly maintained – having only been used for grazing, dumping garden waste and fly-tipping / sensitive development could enhance the appearance of the area</p> <p>Historic England – No nearby designated heritage assets</p>	
<p><i>Green Belt:</i> 'Major' harm to the Green Belt</p> <p>The site delivers a 'moderate' contribution to the Green Belt; therefore, its loss would be detrimental to the area and would negatively affect the natural landscape</p> <p>The Green Belt is there to protect villages from urban sprawl, removal of areas such as this will undermine rural communities and village life by merging villages and making them part of one large sprawl of houses from Chell / Packmoor to Harriseahead / Mow Cop</p> <p>No exceptional circumstances exist to justify the loss of Green Belt land in this location / inadequate justification provided, particularly if based on out-of-date data (i.e. housing need); exceptional circumstance has a narrative re. well-served by public transport, which this site is not</p> <p>Government policy is to not remove land from the Green Belt for house building</p> <p>Green Belt is Green Belt for a reason and should never be built on</p>	

<p>Building on Green Belt land is unethical in a time of climate change – we need more Green Belt areas, not less</p>	
<p><i>Deliverability:</i></p> <p>The site is listed as not deliverable or developable in the 2022 SHELLA report</p> <p>Potential remediation works to mitigate historic contamination (mining, dumping of red ash) may make the development unviable</p> <p>The landowner has no intention of selling or developing the field</p> <p>The landowner would be happy for it to be developed for housing to improve the area</p>	
<p><i>Other:</i></p> <p>Brownfield sites in Newcastle-under-Lyne (some of which are owned by the Council) should be developed instead, which are more suitable and would deliver positive benefits for the community, particularly disused factory sites, which appear destitute in places</p> <p>Greenfield / Green Belt sites chosen as they are the cheapest to build on</p> <p>No local housing need – based on inaccurate / out-of-date data; the population of the Borough is falling; there are many vacant homes in the Borough; many additional homes built in the area in recent years available for sale</p> <p>Concern regarding safeguarding of the adjacent ‘Newcastle Way’</p> <p>Development contrary to the government’s aspirations regarding sustainability and climate change with an emphasis on green spaces</p> <p>Limited (if any) employment within walking or cycling distance and very little in the way of public transport</p>	

<p>Loss of agricultural land / reduction in food production capacity</p> <p>The necessary infrastructure to support the development will lead to more building / loss of countryside</p> <p>None of the advantages of urbanisation will be delivered – employment, improved transportation and educational opportunities etc</p> <p>Site may be contaminated – land in and around previously used for mining and the site itself was used for the historic dumping of red ash</p> <p>Appears to be a ‘done deal’ and thus a waste of time objecting to</p> <p>There has not been a lot of development in this area, and this would provide much needed local housing</p> <p>Sustainable location – with a primary school within walking distance and a short commute to Kidsgrove train station</p> <p>Part of the site has been granted planning permission in the past</p> <p>Request for a further Call for Sites to find more suitable sites (COVID caused a lot of distraction for lots of reasons)</p>	
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108. FDLP NC77 Bent Farm, Newchapel

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Loss of privacy, light / overshadowing, outlook and visual amenity</p> <p>Additional noise, dust, light pollution and disturbance associated with construction / construction vehicles</p> <p>Additional cars significantly increasing emissions / reduction in air quality</p> <p>Increased pollution (air, noise and light), all having a detrimental impact on the physical and mental health / wellbeing of residents (including respiratory conditions)</p> <p>Increased air pollution, including potentially hazardous gases and dust released from old mine workings adversely affecting residents, in particular, children</p> <p>Unclear where the local authority's targets to achieve clean air has been factored into the proposals / negative impact on the Air Quality Management Plan</p> <p>Increased odour from Walley's Quarry because of more waste being sent there</p> <p>Loss of green space would have a detrimental impact on the physical and mental health / wellbeing of residents (including obesity rates)</p> <p>[Devaluation of property]</p>	<p>The site has been removed from the Final Draft Local Plan.</p>
<p><i>Social infrastructure:</i></p> <p>Loss of open green / recreational space – the footpaths that cross the site enable it to be used by many local people for recreational purposes and to observe wildlife and plant-life close-up</p>	

<p>Insufficient infrastructure – doctors, dentists, chemists, nursery and school places are already oversubscribed; no banks, post office, shops, insufficient open spaces, leisure facilities and jobs</p> <p>Harriseahead school could be expanded but only by building on the playing field or the all-weather playground</p> <p>The health and wellbeing of residents will not be compromised as there are many cycle and walking routes near the site which lead to Bathpool Park, Westport Lake and Hanley Forrest Park via tracks / the canal</p> <p>There are sufficient primary and secondary schools in the area, many of which are already in decline in terms of numbers / undersubscribed</p> <p>Local doctors are undersubscribed and there are additional rooms in the surgery to accommodate additional practitioners, if required</p> <p>Site immediately opposite a local medical centre, pub and pharmacy, with Packmoor Ormiston Academy (primary school) and the Packmoor Community Hall within a five-minute walk</p> <p>The development would deliver new local services and facilities (a parade of units to include a convenience shop) and contributions to enhance existing services, creating a new / strengthened Local Centre</p> <p>The possibility of new local shop/s (including, possibly, a cafe) within walking distance of local residences would be a welcome addition, would reduce car reliance and would benefit those who cannot walk very far or who do not drive</p>	
<p><i>Transportation:</i></p>	

<p>Staffordshire County Council – Any Master Plan will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority and a Travel Plan</p> <p>Staffordshire County Council – Access available via Newtown</p> <p>Other transport comments from other parties</p> <p>The roads in the area, which are narrow with bad bends, in poor condition and often without pavements and with cars parked along them, were not designed for the type and volume of traffic they already carry (cars, HGVs, buses etc) and are already dangerous, with many residents already not able to exit their drives safely.</p> <p>Bringing additional cars onto the local network (up to 400-500 if combined with NC13), including construction-related vehicles, will increase congestion, noise, pollution, disturbance and reduce road safety, particularly around the local schools (there have been several accidents involving school children in the area recently).</p> <p>Colclough Lane / Birchenwood / Station Road is a county lane with several blind bends and is already in the top 5% most dangerous roads within Staffordshire, having seen 5 road traffic accidents since January 2023 that have required police presence. Thursfield Road [Newtown], which runs along the other side of the site, is also very busy.</p> <p>There are several bottlenecks around the area, including around Thursfield school, Pennyfields Road, Long Lane (rat-run), Bull Lane (rat-run), Colclough Lane (rat-run) and the roundabout at the end of Turnhurst Road, which is regularly grid-locked.</p>	
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<p>Ormiston Academy now has their entrance onto Turnhurst Road, with children being dropped-off, picked-up and walking on an extremely busy road</p> <p>Roads in the area are not dangerous.</p> <p>There are no more road accidents on the roads near the site than in the wider area generally and more houses locally will encourage more children to walk to school, thus alleviating some of the traffic issues caused by school runs.</p> <p>Access to the site is difficult and unsafe, with sharp bends on the local road (Station Road). The 2022 SHELLA report notes that the site has constrained access.</p> <p>The site has a 100m+ frontage onto Turnhurst Road with 3 existing vehicular accesses to the site, which have been used for years with no problems. Turnhurst Road is a main road with footpaths on both sides and is not usually used for parking related to the schools in the area.</p> <p>Inadequate public transport – poor local bus services and Kidsgrove railway station a long walk away – all resulting in reliance on cars.</p> <p>Lack of support for public transport – insufficient bus shelters, inadequate parking at and closing of the ticket office at Kidsgrove railway station</p> <p>Newtown and Turnhurst Road forms part of one of the area's main bus routes and there is a bus stop directly opposite the site.</p> <p>There are safe cycle routes around the area leading from the site to many local towns (Tunstall, Burslem, Kidsgrove, Hanley, Westport Lake and Peacocks Hay) which would minimise car use.</p>	
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<p>A traffic survey must be undertaken at a time to provide an accurate representation of the existing levels of congestion (i.e. during term-time).</p> <p>Roads already hazardous in winter due to elevation / poor weather conditions (snow), particularly Pennyfields Road, which is very steep.</p> <p>Insufficient school places locally will lead to children travelling further afield – resulting in more traffic on the roads.</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Negative impact on watercourses / water quality – the local sewage works is already often at capacity, sometimes leading to discharge into watercourses.</p> <p>The site is marshy and facilitates natural drainage – its development would increase flood risk due to ‘run-off’.</p> <p>Concern regarding contamination of water from disturbed mine workings.</p>	
<p><i>Biodiversity:</i></p> <p>Loss of trees and green space resulting in diverse wildlife / habitat loss – insects (rare butterflies, bees, ladybirds, wasps), bats, birds (blackbirds, sparrows, blue tits, bullfinches, chaffinches, robins, swallows, skylarks, pheasants, partridges, owls, kestrels, sparrowhawk, buzzards) and mammals (moles, rabbits, squirrels, hedgehogs, foxes, badgers).</p> <p>The area itself has a small pond and a small brook running through it, which attract a variety of wildlife (great crested newts, frogs, toads, dragonflies, herons' coots and ducks).</p> <p>Loss of oak trees and a substantial stretch of ancient hedgerow, which contains rare woodland species and is potentially / should be protected under the Hedgerows Regulations 1997.</p>	

<p>Loss of wild English meadow (95% of which have been lost), containing a wealth of biodiversity that is reaching 'climax vegetation' stage, including rare native flora (wild orchids, foxgloves, rosebay willowherb, yellow rattleweed, vetches and over 20 different / rare grasses).</p> <p>Ecological survey not sufficiently up to date to reflect the true biodiversity of the site.</p> <p>Loss of carbon storage, cooling and shading, green network / opportunities for species migration, the protection of water quality and natural management of flood risk.</p> <p>Attention drawn to Section 40 of the Natural Environment and Rural Communities Act 2006 – duty for local authorities to consider conserving biodiversity as an integral part of policy and decision-making.</p> <p>The site has re-wilded and is high in biodiversity – replacement ecology areas on a developed site would not adequately compensate for the natural ecology of the site being destroyed.</p> <p>The design approach will create an environment that contributes to the achievement of the Council's climate change objectives (Policy CRE1).</p> <p>Areas of green space, defensible borders and the pond on the site could be retained to accommodate wildlife.</p>	
<p><i>Character:</i></p> <p>Scale of development out of keeping with the semi-rural character of the villages (Packmoor and Newtown).</p> <p>Erosion of local character – the gap provided by NC77 helps to denote the historic villages and character of the area – the sense of moving from one village to another. Loss of this space would have a detrimental impact on</p>	

<p>the special character of each village, resulting in the merging of Packmoor and Newchapel and housing approximately 2 miles long from Turnhurst Road to Chapel Lane and an unbroken conurbation / urban sprawl from Tunstall and all the Potteries towns, all the way to Mow Cop, with the outlying villages swallowed-up.</p> <p>Loss of the sense of space and place / will not preserve and enhance the special character of the individual villages.</p> <p>Loss of the character, appearance and quality of the countryside.</p> <p>The land has been abused and neglected over the years (used as a dog toilet and dumping ground) and its development could enhance the appearance of the area.</p> <p>Historic England – Cannot locate site but no designated heritage assets in the vicinity of Newchapel.</p>	
<p><i>Green Belt:</i></p> <p>Stoke-on-Trent City Council – The site allocation is adjacent to the shared boundary between our respective Councils. In the Green Belt Assessment (2020), the site is contained within parcel 18 which spans both Councils. The current site boundaries do not appear to have been assessed further in terms of the impact upon the Green Belt purposes including preventing neighbouring towns merging. Stoke-on-Trent City Council would therefore like to raise concerns about the inclusion of the site without full consideration of how the site will impact upon the Green Belt and the City.</p> <p>Comments from other parties include:</p> <p>‘Major’ harm to the Green Belt.</p>	

The site delivers a 'moderate' contribution to the Green Belt; therefore, its loss would be detrimental to the area and would negatively affect the natural landscape.

The Green Belt is there to protect villages from urban sprawl, removal of areas such as this will increase / consolidate urban sprawl, with the villages of Packmoor, Newton, Newchapel and Harriseahead merging from Chell / Packmoor to Harriseahead / Mow Cop.

No exceptional circumstances exist to justify the loss of Green Belt land in this location / inadequate justification provided, particularly if based on out-of-date data (i.e. housing need); exceptional circumstance has a narrative re. well-served by public transport, which this site is not.

Government policy is to not remove land from the Green Belt for house building.

Building on Green Belt land is unethical in a time of climate change – we need more Green Belt areas, not less. How will the loss of Green Belt be compensated for?

Overall the site makes a 'weak' contribution to the function of the Green Belt – it does not play a role in checking the unrestricted sprawl of large built-up areas (Tunstall and Kidsgrove are both two miles away); it has strong defensible boundaries on all sides (roads or existing residential development); it could be considered small-scale infilling / the logical conclusion of the settlement; it does not play a role in safeguarding the countryside against encroachment (it is primarily scrubland with some previously developed land – the site of the former Packmoor Working Men's Club and lock-up garages); it does not play a role in preserving the setting / special character of an historic town.

<p>The site represents a minor release of land from the Stoke-on-Trent Green Belt (0.01% of its overall area).</p>	
<p><i>Deliverability:</i></p> <p>Deemed unsuitable for housing in the 2022 SHELLA report due to mining, flood risk, Japanese knotweed and access problems and a 'high risk' site by the Coal Authority.</p> <p>The site promoter has confirmed that the site capacity is 130 residential units (57 market / affordable homes, 3 retirement bungalows and a 70-unit extra-care facility).</p> <p>A locally operating Registered Provider is to be engaged to secure the provision and management of the affordable and retirement elements, with the landowner responsible for the delivery and management of the local centre.</p>	
<p><i>Other:</i></p> <p>Old colliery / mine shafts / sink holes on the site. It was only declared stable if it is not disturbed.</p> <p>Many houses in the vicinity have already suffered subsidence – concerns raised regarding the impact of excavation works on ground stability / further subsidence issues in relation to existing buildings.</p> <p>Brownfield sites in Newcastle-under-Lyne (some of which are owned by the Council) should be developed instead, as they are more suitable – being closer to amenities and employment opportunities, and would deliver positive benefits for the community, particularly disused factory sites, which appear destitute in places and vacant commercial properties in the city centre.</p> <p>Local housing need figures too high – based on inaccurate / out-of-date data; does not consider the Green Belt status of the land; population and employment opportunities in the Borough are falling; there are many</p>	

<p>vacant homes in the Borough; many additional homes have been built in the area in recent years.</p> <p>Unsustainable location.</p> <p>Loss of agricultural land / reduction in food production capacity.</p> <p>Concern regarding loss or diversion of public footpaths that cross the site.</p> <p>Development contrary to the government's aspirations regarding sustainability and climate change with an emphasis on green spaces.</p> <p>None of the advantages of urbanisation will be delivered – employment, improved transportation and educational opportunities etc.</p> <p>Green spaces, which support physical and mental health, save circa £1.2 billion for the NHS and local health services.</p> <p>Request for a further Call for Sites to find more suitable sites (COVID caused a lot of distraction for lots of reasons).</p> <p>Insufficient early consultation with residents / their opinions not being properly considered / the site already has planning permission for a development known as 'Boundary Park' / it appears to be a 'done deal' and thus a waste of time objecting to.</p> <p>Mining records indicate there are no mine entrances on the site.</p> <p>The site is a mix of predominantly scrubland and previously developed land (the former Packmoor Working Men's Club and several lock-up garages off Turnhurst Road).</p>	
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<p>The site is suitable for development – being Grade 4 Agricultural Land, not used for farming, not of any historical interest and not within an AONB (Area of Outstanding Natural Beauty).</p> <p>Sustainable location – good access to public transport (next to one of the area’s main bus corridors and 10 minutes from Kidsgrove Railway Station); good access to many local employment opportunities (the units on Reginald Mitchell Way, the petrol station/food court at the top of James Brindley Way, new units at Ceramic Valley and new warehouses on Peacocks Hay Road); and good access to existing and proposed local services.</p> <p>The development will deliver a mix of housing types to address identified local needs (in particular, affordable housing and housing for older people) and will bring more jobs into the area / provide an opportunity for people to live closer to where they work.</p>	
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109. FDLP SB12: Land Adjacent to Clayton Lodge

Summary of Main Issues Raised	How the main issues have been taken into account
No accompanying plans to limit the traffic or to improve the already struggling infrastructure.	The site is a planning commitment (post March 2023) and is included in Appendix 4 of the Final Draft Local Plan
Historic England - Site needs to consider any impact on Clayton Hall Grade II and Clayton Conservation Area.	

110. FDLP SP11: Former Keele Municipal Golf Course

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Impact on air quality – hydrogen sulphide emitted by Walleys Quarry, increased carbon dioxide generated by additional traffic, reduction in the number of trees and the low-lying nature of the area will all combine to further reduce air quality</p> <p>Pollution and disruption whilst building takes place - years of dust, noise, contractor's traffic and general disruption to residents</p> <p>Loss of residential amenity (peace, quiet, privacy and light) for residents and the associated impact on their mental health and wellbeing</p> <p>Loss of green open space / recreational / countryside space within walking distance of homes, resulting in detrimental impact on local people's physical and mental health / wellbeing, including an adverse impact on local obesity rates</p> <p>The impacts of Walleys Quarry have already resulted in the need for specific mental health services to serve the local population and mental health services recommend the use of green spaces to support health</p> <p>Park Road, which is used by people for exercise (including the disabled, those less mobile and children travelling to school) would become dangerous</p> <p>[Devaluation of local properties]</p>	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report ED029 alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The Council acknowledges the concerns raised regarding the potential impact of the development on residential amenity, including the potential for loss of privacy, light/overshadowing, outlook, and visual amenity, as well as increased noise, dust, light pollution, and disturbance during construction. The Council also recognises the concerns about the potential impact on air quality and the environment.</p> <p>The Plan includes a number of policies designed to mitigate these potential impacts:</p> <p>Policy SE12 'Amenity': This policy requires new development to be designed in a way that safeguards residential amenity from various sources of potential harm, including noise, light pollution, odour, traffic, and inappropriate development. The policy also incorporates the agent of change principle, placing responsibility on developers to mitigate any adverse impacts on existing amenities.</p>
<p><i>Social infrastructure:</i></p> <p>Sport England – Objection to the allocation on the grounds that it is sited on a playing field site without it being demonstrated that the site is surplus to requirement, or that replacement provision is to be provided in line with NPPF paragraph 99</p>	

<p>Sport England – The Playing Pitch Strategy identifies that the site is surplus to requirement, although the driving range should be protected (retained or adequately re-provided as part of the Keele growth corridor exercise). The retention / relocation of the driving range is not explicit within the specific requirements for the site</p> <p>Sport England – Site specific requirements should refer to playing field sites and the need to demonstrate compliance with NPPF paragraph 99, as there is no protection policy contained elsewhere within the Plan</p> <p>Comments from other parties include</p> <p>The golf course is a Community Asset</p> <p>Loss of formal sports provision - golf course, driving range, fishing pool and playing fields on Back Lane</p> <p>Loss of easily accessible recreational open space, which has declined by a third this century (Source: New Economics Foundation) – the flat ground enables the site to be used by people of all abilities and is even accessible to people with disabilities, our ageing communities and those using disability scooters</p> <p>Recreational space like this must be protected for not just physical but mental well-being / it has always been used as a recreational space</p> <p>There are several Open Spaces adjoining the site, which are designated in the Open Space and Green Infrastructure Strategy as either ‘High Quality / High Value’ or ‘Low Quality / High Value’, the actions for which are to be ‘protected and enhanced’. Development of SP11 will result in damage to these areas of Open Space given the volume of inflows of people and the resultant increase in foot traffic</p>	<p>Policy SE1 'Pollution and Air Quality': This policy requires new development to minimise air pollution and to address the cumulative effects of emissions from proposed development alongside other existing sources of air pollution. The policy promotes sustainable transport modes, encourages the use of low-emission vehicles, and supports the increased provision of electric vehicle charging infrastructure.</p> <p>Policy SE2 'Land Contamination': This policy requires assessment and remediation of contaminated land, including the consideration of the potential for flood events to exacerbate contamination risks.</p> <p>Policy SE5 'Water Resources and Water Quality': This policy promotes the protection of water resources and the efficient use of water. It requires development to avoid unacceptable impacts on water quality and incorporates requirements for sustainable drainage systems.</p> <p>In relation to SP11, the site-specific policy requires several technical assessments to be submitted with any planning application, including: A Heritage Impact Assessment and archaeological recording to consider impacts on the setting of Keele Hall.</p> <p>A noise mitigation strategy, odour assessment, land contamination, coal mining risk assessment to consider detailed matters across the site. The site requires a masterplan and design code to recognise the potential of the site to deliver high quality development.</p> <p>The site has also been split into 4 individual parcels, with the retention of a country park through the middle of the proposed allocation. Supported by an infrastructure delivery plan, the policy requires the provision of a primary school and health provision, directly on site.</p> <p>The site policy also confirms access arrangements expected into the wider site. The impact of development on the local highways network has been</p>
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<p>Insufficient infrastructure - doctors, dentists, schools and other services which are already oversubscribed</p> <p>Already oversubscribed medical facilities will be exacerbated by the additional population leading to increased patient ill-health</p> <p>Request that GP provision planning gain clauses be considered and implemented and ring-fenced for specific health service space spend – if this does not occur the quality and access to general practice will slip further. Our buildings are at capacity but could be extended (Silverdale and Ryecroft Practice)</p> <p>An Infrastructure Plan is required – to include highway impacts and how essential services will be met (schools, medical facilities, post office etc)</p>	<p>considered through the Strategic Transport Assessment which has identified the need for the site to make contributions towards highway improvements, to facilitate the distribution of traffic from the A525 to Whitmore Road.</p> <p>The Council acknowledges that the site is in Green Belt. Green Belt impacts have been considered through the Green Belt Assessment (Part 4). The exceptional circumstances for Green Belt release are included in the Plan Strategy Housing Topic Paper [ED031].</p>
<p><i>Transportation:</i></p> <p>National Highways – The site is likely to have an impact on the SRN in terms of traffic. The immediate SRN junctions likely to be impacted are M6 J15; and A500 (Queensway) / A34 roundabout. Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed to determine the extent of their potential impacts on the operation of the SRN in the area</p> <p>Staffordshire County Council – Vehicle and pedestrian access to the site available via A525 Keele Road and Park Road. Off-site improvements required to enhance cycle and pedestrian connectivity to Silverdale, Keele University and Newcastle Town Centre</p> <p>Staffordshire County Council – Limited amenities / facilities available to serve large-scale development. Inclusion of supermarket and bus services should be considered to support the residential development</p>	

<p>Staffordshire County Council – Any Master Plan will need to be supported with a Travel Plan and a Transport Assessment, in line with any scoping note agreed with the Highway Authority</p> <p>Comments from other parties include</p> <p>General concern regarding increased traffic – resulting in reduction in road safety and congestion / overloading of already busy local roads</p> <p>The proposal will lead to new traffic routes (possibly at Keele and one through Silverdale) which will create bottlenecks. Silverdale as a village is not set up for such an increase in vehicles, particularly around the primary school, which does not have a crossing warden – a consequence of more traffic is a reduction in road safety / increased risk of accidents</p> <p>Existing road system inadequate – already under pressure due to other new developments in the area (the Hawthorns – c.80 new homes, the Oaks – c.100 new homes and the Hamptons – c. 130 new homes); in a poor state of repair; and unsuitable to accommodate the additional volume of traffic and / or construction-related vehicles</p> <p>The traffic impact analysis undertaken for Quarry Bank Road (for 435 Units) indicates that there is sufficient capacity on the surrounding highway network, albeit with mitigation at the A525 Keele Road / A525 Newcastle Road / A531 Crewe Road junction, however, there is limited scope for mitigation at the junctions without using third party land</p> <p>Concern regarding the location of access onto Park Road and associated reduction in road safety (Park Road is used by people for exercise, including the disabled, those less mobile and children travelling to school)</p>	
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<p>Access would either mean a new junction near to the entrance of the University, which already suffers congestion, or through quiet residential streets in Silverdale</p> <p>Access via the Keel roundabout is unsuitable as it is too busy already</p> <p>Access should be provided into Silverdale and not just onto the A525</p> <p>Access should not be provided into Silverdale but via the entrance to the golf course on Keele Road - Ashbourne Drive and Underwood Road are too small to carry builders' lorries and the vehicles associated with 1,170 additional houses and opening-up the cul-de-sacs off Ashbourne Drive will create a racetrack in Park Road and past the school</p> <p>Concern regarding loss of Public Rights of Way across the site</p> <p>On-street parking is already an issue in Silverdale village with parking at local amenities (the parade shops and doctors' surgery) already at capacity, with elderly people often struggling to find somewhere to park when shopping / visiting the GP.</p> <p>No bus route / public transport inadequate, resulting in people using their cars; new residents likely to commute to major cities for work; and loss of local open space, forcing people to travel to other areas for recreation.</p> <p>The Infrastructure Baseline Report (October 2021) does not include any analysis of additional traffic congestion arising from additional housing in the western Wards.</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries).</p>	

Increased flood risk – the site is on a steep hill (a fall of roughly 45-50 metres from Keele Road to Park Road), is very boggy in places and has natural springs. The undeveloped landforms an important soakaway for rainwater and loss of this, combined with the loss of many mature trees will increase flood risk on lower ground – i.e. Silverdale.

The Level One Strategic Flood Assessment shows a flood risk to the Silverdale Brook area and page 62 of the FRA (2008) states “the Silverdale area of the Borough where there have been reports of groundwater flooding ... this remains a long-term risk as pumping and de-watering of the mines will have to occur in perpetuity. It is therefore recommended that future development in this location is avoided due to the residual risk posed”.

Regular flooding already occurs during rainstorms and sewage runs out of a number of drain covers. The roads are constantly flooded by heavy rain at the junction of Cemetery Road and Silverdale Road with Underwood Road and Dale View also prone to flooding.

Ashbourne Drive was regularly flooded during the 70's and 80's until a trench was dug across the golf course and many, many trees planted.

The importance of trees on the site for balancing the hydrology of the surface water with underground aquifer pressure - there should be a Hydrogeological Study to calculate the change to the water equilibrium.

It is well known that if vegetated land is replaced by manufactured materials such as tarmac and concrete then the amount of surface run-off from rainfall alone increases, not to mention the already natural water resources.

The Local Plan's Vision Statement growth states development should mitigate rather than exacerbate localised flooding problems caused by

<p>river flooding and / or surface water run-off, yet this does not seem to have been considered when proposing the removal of long-established vegetation.</p> <p>Request made that the plans for the drainage management of the site be provided. Furthermore, it is not considered unreasonable to expect written agreements that should properties be flooded, all repairs/replacements will be provided by NuLBC, who would be viewed as being responsible.</p>	
<p><i>Biodiversity:</i> Natural England – This site includes parts of Sites of Biological Importance. We are unable to provide specific advice, but we would advise that if these allocations will cause adverse impacts on these sites they should be deleted as allocations in line with paragraph 174 of the NPPF.</p> <p>Comments from other parties include:</p> <p>Loss of a re-wilded green space that contains thousands of varied broadleaved and coniferous trees / mature trees, hedgerows and natural habitats – resulting in loss of flora (wild sorrel, rare grasses), reduction in pollination, fragmentation of habitats and wildlife / habitat loss (a diversity of insects and butterflies, bees, slow worm, stag beetle, squirrels, foxes, badgers, hedgehogs, brown long-eared bats, cuckoo, woodpeckers, a range of nesting birds and birds of prey, such as owls, kestrels and buzzards) = net loss in biodiversity.</p> <p>Development should deliver a minimum 10% net gain in biodiversity, which is clearly unachievable.</p>	

<p>Loss of fishing ponds and natural pools / blue corridors on the land, which have generated a unique marshland habitat and contain a range of wildlife, including amphibians, toads, frogs and newts.</p> <p>Within the site is a Biodiversity Alert Site (Bogs Wood) and a Regionally Important Geological Structure (Job's Wood Quarry) and adjoining its western boundary is another Biodiversity Alert Site (Redheath Plantation) Jobs Wood and Redheath Plantation are old / ancient woodlands (which cannot be replaced) and include protected native flora such a bluebell, marsh marigolds and wood anemones.</p> <p>Unsuitable allocation due to biodiversity impact, protected trees on site (Tree Preservation Orders) and negative assessment for land & soil.</p> <p>Removal of mature trees will reduce air quality, increase flood risk and reduce natural carbon capture / the existing woodland should form part of the development brief for the site.</p> <p>Loss of carbon store – large-scale carbon sequestration is best achieved by retaining and maintaining well-established trees and 'rewilding managed 'grasslands. Threading 'green strips' amongst extensive areas of housing will never achieve the objective of carbon sequestration set out in SO1V.</p> <p>No ecological surveys have been carried out / a detailed statutory designated sites assessment up to 10km will be required to ascertain the National Context of the site along with a Habitat Regulations Assessment.</p> <p>A baseline field survey of the site has confirmed the presence and potential presence of several species (including great crested newts, bats and badgers), all of which pose a high risk to development and require further assessment / mitigation.</p>	
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<p>Keele golf course is an important biodiversity green link between Keele Woods, Silverdale Country Park, Bateswood and Apedale – this site provides an opportunity to create a green corridor on the west side of Newcastle.</p> <p>The UK is one of the most, if not the most, nature-depleted countries in Western Europe.</p> <p>Natural England guidance states that no developments should be permitted near ‘protected sites’ unless it can be proved that they are nitrate and phosphate neutral.</p>	
<p><i>Character:</i> Historic England – Consider the impact on Keele Hall Registered Park and Garden Grade II opposite the site, as well as Keele Conservation Area and associated listed buildings nearby.</p> <p>Comments from other parties include:</p> <p>Loss visual amenity / the outstanding beauty of the site / significant landscape impact – development would be viewed in the landscape as a conspicuous, large-scale urban extension across the steep sides of the wooded hillside.</p> <p>Development would directly conflict the Landscape Character Area Landscape Strategy guidelines for this character area type, which is to ‘conserve and enhance woodland on steep slopes’.</p> <p>The Overall Appraisal the Landscape Character Assessment Study concludes that “larger residential development on this site would have a major adverse effect on the SA objective to strengthen the quality of the landscape and urban townscape and deliver well-designed development which respects the local character and distinctiveness”.</p>	

<p>Significant impact the character and setting of the historic village of Silverdale.</p> <p>Urban sprawl will join Silverdale with Keele and Poolfields, thereby removing the character and distinctiveness of each village, contrary to SO-XIII, which states that the vitality of industrial villages should be supported, and their special character preserved and enhanced. The proposed developments, which will double the size of Silverdale, will undermine its historical character as a village ‘nestled in a green valley’ The Council’s classification of rural and urban parishes pre-disposes certain Wards for amalgamation and compaction, ignoring their historic origins, and creates an elite set of historic villages in more rural areas.</p> <p>Villages such as Silverdale should be defined under ‘historic industrial villages and their status should reflect their specific economic and social origins in the development of iron and coal mining on landed estates. These villages have their own identity – a fundamental reason not to incorporate them into the urban core as ‘Strategic Centres’.</p> <p>Mass estate house building has a detrimental impact on neighbourhoods and healthy communities, creating artificial, anonymous places that facilitate anti-social behaviour and lack of social cohesion. The scale of development proposed will overwhelm the village and its population, eroding its character as a small rural community.</p>	
<p><i>Green Belt:</i></p> <p>‘Major’ harm to Green Belt (overall, the proposals will reduce greenbelt by 25 per cent in Silverdale alone, in perpetuity).</p> <p>The site provides a ‘strong’ (not ‘moderate’) contribution to the Green Belt – on the basis that it is not surrounded by durable boundaries; that development would result in urban sprawl stretching from the Strategic Centre of Silverdale to the proposed settlement boundary of Keele and Keele University; and that the scale and impact of development would</p>	

<p>have a significant impact on the open countryside / would help eradicate the countryside separation between Silverdale and Keele.</p> <p>Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement).</p> <p>The purpose of the Greenbelt is to check unrestricted sprawl, to safeguard the countryside from encroachment and to preserve setting. This development will merge Silverdale and Keele into one large urban conurbation, thereby losing individuality of each village, which the Green Belt was designated to prevent.</p> <p>Keele (rural) and Silverdale (a mix of urban and rural) should not become part of Newcastle's urban area – they are villages and are distinct and should remain so – protected by the Green Belt.</p> <p>The methodology adopted in the Green Belt Review where ‘historic towns’ are given an enhanced status ignores the complex industrial history elsewhere, i.e. historic industrial villages.</p> <p>No exceptional circumstances to justify changes to Green Belt designations.</p> <p>Government policy is to not remove land from the Green Belt for house building.</p> <p>The Council’s Green Belt Assessment is fundamentally flawed, not up-to-date and does not consider the impact of the site on the proposed settlement of Keele & Keele University, or the wider countryside.</p>	
<p><i>Deliverability:</i></p> <p>The golf course was given to the Council on the agreement that it will only ever be used as a golf course / there is a covenant on the land.</p>	

<p>The site it has significant technical and environmental constraints (outlined in the Site Selection Interim Report) that have not been fully considered.</p> <p>The SHELAA (2022) identified the site as 'Unsuitable' for both Housing and Employment use and as a 'Site not in Deliverable & Developable Supply'.</p> <p>The cumulative impact of the potential presence of protected species on the site creates a major issue for the site's deliverability.</p>	
<p><i>Other:</i></p> <p>Over-concentration / disproportionate volume of housing proposed in the area - the net increase in population suggested at Keele, Silverdale and one of the developments on the Keele / Thistleberry boundary would add over 2,000 houses, amounting to approximately 4,400 more people, which is unfair in a tightly defined area / the volume of additional population will increase density in Silverdale to 22 pph (only 6.6 pph in the rest of the Borough – using the same assumptions) and would result in an additional 46% households in Silverdale.</p> <p>More sustainable brownfield and underused sites, the town centre and unused retail and commercial premises should be redeveloped before green field sites (also, there are empty properties of all kinds which could be redeveloped for housing).</p> <p>The Council should be pro-active in seeking out locations that are redundant and work with owners to tackle the neglect.</p> <p>No housing need – based on inaccurate data and an overly optimistic view of job growth in the Borough; the population of Newcastle is falling; there are many vacant homes in the Borough (1,200 – which are unusable and require investment); Government housing targets have been reduced / changed from statutory to advisory; there is an oversupply of housing in England and Wales.</p>	

<p>The new houses will be rented to students and will therefore have little impact on housing need for local people / affordable housing content too low (should be 50%).</p> <p>Loss of Grade 3 Agricultural Land / grazing land – for potential food or energy production in the future.</p> <p>The site is on a fault line and may have underground mines (the historic mine at Knutton Manor had shafts sunk close to Park Road), be a former landfill site, or otherwise be contaminated (potential for methane).</p> <p>Concern regarding underground mines and the impact that construction works (digging, vibrations etc) would have on existing buildings (i.e. loosening of soil / substrate underground that rain or spring water may wash away over time, causing sink holes, for example).</p> <p>Unsuitable allocation due to its designation as a Regionally Important Geological Site and location within a Mineral Safeguarding Area.</p> <p>No explanation given for the different densities on sites SP11, SP12 and SP23 (which are based on site ownership rather than sound planning grounds).</p> <p>Contrary to the Council's stated aim of helping to combat climate change The opinions of local people in Silverdale and Keele have not been considered.</p> <p>No clear rationale for the site selection and no justification to support it in the evidence base.</p>	
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<p>The Sustainability Appraisal identifies many negative definitive assessments in relation to the allocation, including a 'major negative' impact on biodiversity and a 'minor negative' impact on the economy.</p> <p>Development of this scale impractical given its topography and geology / the Site Selection Interim Report refers to the former golf course as being 'relatively flat' (and so suitable for redevelopment), which it is not.</p> <p>The owner of Keele Golf Centre has expressed concern regarding the future of the business, which is within site SP11 and on land leased from the Council. They advise that the business, which employs 15 local people, is thriving and is very popular with a wide range of users and that they would like to retain the site and develop it into a bigger and better facility.</p> <p>Suggestions for the site:</p> <ul style="list-style-type: none"> > retain as a Municipal Golf Course, a natural recreational space / wildlife haven, or as another local recreational attraction, with the old club house redeveloped as a visitor centre with café and/or centre for weddings and events etc; > use as a Biodiversity Net Gain area, whereby parcels of land could be purchased by local developers to 'offset' development elsewhere; > retain 50% of the site as Green Belt; > provide 300 homes at the top of the golf course / near the driving range, with no through-road to Silverdale; > develop a portion of the site (potentially the top section, at a higher density) in tandem with the establishment of a large and publicly accessible green space; > only build on the land between the University roundabout (on the A525 and proposed allocations SP12 and SP23; > retain the field / grassed areas behind Hulme Close and Ashbourne Drive and the cul-de-sacs off Ashbourne to provide a natural buffer; 	
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- > retain of a strip of Green Belt in between Silverdale and Keele to keep them separate and to satisfy some of the concerns around loss of trees and green space;
- > retain the trees that line the A525 (Keele Road)

The site was gifted to the Council on instruction to be used for the good of the people of the Borough and not be built upon.

Need for the local planning authority to remain independent despite the Council being owner of the largest proposed site in the area.

Potential for increased crime and anti-social behaviour due to increase in population.

Alternative sites proposed - the area along Cemetery Road and the disused site in Knutton (where the gym was).

The site is situated in a sustainable location.

The area of land to the rear of Hulme Close has never formed part of the Golf Course (notwithstanding common ownership) and the preservation of the field & hedges found here would establish a ready-made defensible boundary. In setting any such boundaries, it is important to be conscious of the watercourses on the golf course and on Park Road. Reference is made to a natural drain which runs the length of the field behind Hulme Close and the properties backing onto that field have previously had ingress of water.

Suggestions for the site (under Other, with underlined text denoting change):

Provide 300-400 homes at the top of the golf course / near the driving range (on Keele Road), with no through-road to Silverdale.

<p>It is unclear how building more homes will increase job opportunities as it is not apparent what commercial development will take place. Nor would the proposals improve Newcastle Town Centre as this needs a major overhaul, recognising that the internet has altered shopping habits, and instead consider other alternative uses, such as entertainment venues and restaurants/cafes.</p> <p>The Local Plan does not consider the current residents of the village.</p>	
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111. FDLP SP12: Site off Glenwood Close

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i> Loss of light and privacy to existing properties (site on higher ground than the bungalows to the north)</p> <p>Impact on air quality – hydrogen sulphide emitted by Walleys Quarry, increased carbon dioxide generated by additional traffic, reduction in the number of trees and the low-lying nature of the area will all combine to further reduce air quality.</p> <p>Pollution and disruption whilst building takes place - years of dust, noise, contractor's traffic and general disruption to residents.</p> <p>Loss of amenity (peace, quiet and privacy) for the residents of Glenwood Close and the associated impact on their mental health and wellbeing</p> <p>Loss of local green open / recreational space within walking distance of homes, resulting in detrimental impact on local people's physical and mental health / wellbeing, including an adverse impact on local obesity rates</p> <p>Park Road, which is used by people for exercise (including the disabled, those less mobile and children travelling to school) would become dangerous.</p> <p>[Devaluation of local properties]</p>	<p>The site allocation has been removed from the Final Draft Local Plan.</p>
<p><i>Social infrastructure:</i> Loss of open / green / recreational space and playing fields on Back Lane</p> <p>Insufficient infrastructure - doctors, dentists, schools and other services which are already oversubscribed.</p>	

<p>Request that GP provision planning gain clauses be considered and implemented and also ring-fenced for specific health service space spend – if this does not occur the quality and access to general practice will slip further. Our buildings are at capacity but could be extended (Silverdale and Ryecroft Practice).</p>	
<p><i>Transportation:</i></p> <p>National Highways – The site is likely to have an impact on the SRN in terms of traffic. The immediate SRN junctions likely to be impacted are M6 J15; and A500 (Queensway) / A34 roundabout. Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.</p> <p>Staffordshire County Council – Off-site improvements required to enhance cycle and pedestrian connectivity to Silverdale, Keele university and Newcastle Town Centre.</p> <p>Staffordshire County Council – Limited amenities / facilities available to serve large-scale development. Inclusion of supermarket and bus services should be considered to support the residential development.</p> <p>Staffordshire County Council – Development will need to be supported with a Travel Plan and a Transport Assessment, in line with any scoping note agreed with the Highway Authority.</p> <p>Other transportation comments from other parties include:</p> <p>Concern regarding increased traffic – resulting in reduction in road safety and congestion / overloading of already busy local roads.</p>	

<p>Existing road system inadequate – already under pressure due to other new developments in the area (the Hawthorns – c.80 new homes, the Oaks – c.100 new homes and the Hamptons – c. 130 new homes); in a poor state of repair; and unsuitable to accommodate the additional volume of traffic and / or construction-related vehicles.</p> <p>Park Road is a lane without street lighting or pavements and is unsuitable to serve the development.</p> <p>Concern regarding impact on Park Road and associated reduction in road safety (Park Road is used by people for exercise, including disabled and those less mobile, and children travelling to school).</p> <p>Concerns regarding the site access – its gradient, impact on the amenities of adjacent properties, impact on pedestrians etc who currently use the area as an access point to the open space/s, and impact on the mature native trees / biodiversity.</p> <p>Unsuitable allocation due to access constraints.</p> <p>Access should be via SP11 / the golf course.</p> <p>On-street parking is already an issue in Silverdale village with parking at local amenities (the parade shops and doctors' surgery) already at capacity, with elderly people often struggling to find somewhere to park when shopping / visiting the GP.</p> <p>Public transport inadequate, resulting in people using their cars; new residents likely to commute to major cities for work; and loss of local open space, forcing people to travel to other areas for recreation.</p>	
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<p>The Infrastructure Baseline Report (October 2021) does not include any analysis of additional traffic congestion arising from additional housing in the western Wards.</p>	
<p><i>Water, drainage & flood risk:</i> Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries).</p> <p>Increased flood risk – the site is known to flood regularly, and ground water and springs will naturally re-route downwards towards Silverdale, there is historic flooding in Glenwood Close and the development will result in increased flood risk to properties in both Glenwood Close and Daleview Drive.</p> <p>The Level One Strategic Flood Assessment shows a flood risk to the Silverdale Brook area and page 62 of the FRA (2008) states “the Silverdale area of the Borough where there have been reports of groundwater flooding ... this remains a long-term risk as pumping and de-watering of the mines will have to occur in perpetuity. It is therefore recommended that future development in this location is avoided due to the residual risk posed”.</p> <p>Removing trees at the top of a hill will result in a higher flood risk in the valley below.</p> <p>The importance of trees on the site for balancing the hydrology of the surface water with underground aquifer pressure - there should be a Hydrogeological Study to calculate the change to the water equilibrium.</p>	
<p><i>Biodiversity:</i> Loss of trees and green space resulting in wildlife / habitat loss and a reduction in the volume and diversity of insects, butterflies, birds and mammals (slow worm, stag beetle, nesting owls, great spotted</p>	

<p>woodpecker, cuckoo, finches, blue tits, brown long-eared bat, foxes, badgers and hedgehogs) = net loss in biodiversity.</p> <p>Loss of drainage channels along Park Road, which are home to a range of wildlife, in particular, amphibians, toads, frogs and newts.</p> <p>Jobs Wood is ancient woodland (which cannot be replaced) and includes protected native flora such a bluebell, marsh marigolds and wood anemones.</p> <p>Unsuitable allocation due to protected trees on site (Tree Preservation Orders).</p> <p>Removal of mature trees will reduce air quality, increase flood risk and reduce natural carbon capture / the existing woodland should form part of the development brief for the site.</p> <p>No ecological surveys have been carried out.</p> <p>Negative impact on land & soil The UK is one of the most, if not the most, nature-depleted countries in Western Europe.</p> <p>Natural England guidance states that no developments should be permitted near 'protected sites' unless it can be proved that they are nitrate and phosphate neutral.</p>	
<p><i>Character:</i></p> <p>Significant impact on landscape sensitivity and the character and setting of the historic village of Silverdale.</p> <p>Urban sprawl will essentially join Silverdale with Keele, thereby removing the character and distinctiveness of each, contrary to SO-XIII, which states</p>	

<p>that the vitality of industrial villages should be supported, and their special character preserved and enhanced. The proposed developments, which will double the size of Silverdale, will undermine its historical character as a village ‘nestled in a green valley’.</p> <p>The Council’s classification of rural and urban parishes pre-disposes certain Wards for amalgamation and compaction, ignoring their historic origins, and creates an elite set of historic villages in more rural areas.</p> <p>Historic England – Consider any impacts on Silverdale Conservation Area and St Luke’s Church Grade II.</p>	
<p><i>Green Belt:</i></p> <p>‘Major’ harm to Green Belt (overall, the proposals will reduce greenbelt by 25 per cent in Silverdale alone, in perpetuity).</p> <p>Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement).</p> <p>The purpose of the Greenbelt is to check unrestricted sprawl, to safeguard the countryside from encroachment and to preserve setting. This development will merge Silverdale and Keele into one large urban conurbation, which the Green Belt was designated to prevent (settlements should be distinct and land preserved).</p> <p>The methodology adopted in the Green Belt Review where ‘historic towns’ are given an enhanced status ignores the complex industrial history elsewhere, i.e. historic industrial villages.</p> <p>No exceptional circumstances to justify changes to Green Belt designations.</p>	

<p>Government policy is to not remove land from the Green Belt for house building.</p>	
<p><i>Other:</i></p> <p>Over-concentration / disproportionate volume of housing proposed in the area - the net increase in population suggested at Keele, Silverdale and one of the developments on the Keele / Thistleberry boundary would add over 2,000 houses, amounting to approximately 4,400 more people, which is unfair in a tightly defined area / the volume of additional population will increase density in Silverdale to 22 pph (only 6.6 pph in the rest of the Borough – using the same assumptions).</p> <p>Silverdale should be afforded the same protection as a rural village due to its importance as an industrial village.</p> <p>More sustainable brownfield and underused sites, the town centre and unused retail and commercial premises should be redeveloped before green field sites (also, there are empty properties of all kinds which could be redeveloped for housing).</p> <p>The Council should be pro-active in seeking out locations that are redundant and work with owners to tackle the neglect.</p> <p>No housing need – based on inaccurate data and an overly optimistic view of job growth in the Borough; the population of Newcastle is falling; there are many vacant homes in the Borough (1,200 – which are unusable and require investment); Government housing targets have been reduced / changed from statutory to advisory; there is an oversupply of housing in England and Wales.</p> <p>Loss of Grade 3 Agricultural Land / grazing land.</p>	

<p>The site may have underground mines (the historic mine at Knutton Manor had shafts sunk close to Park Road), be a former landfill site, or otherwise be contaminated.</p> <p>Concern regarding underground mines and the impact that construction works (digging, vibrations etc) would have on existing buildings (i.e. loosening of soil / substrate underground that rain or spring water may wash away over time, causing sink holes, for example).</p> <p>No explanation given for the different densities on sites SP11, SP12 and SP23 (which appear to be based on site ownership rather than sound planning grounds).</p> <p>Contrary to the Council's stated aim of helping to combat climate change Negative impact on mineral safeguarding / unsuitable allocation due to its location within a Mineral Safeguarding Area.</p> <p>The opinions of local people in Silverdale and Keele have not been taken into account.</p> <p>Development of this scale impractical given the topography and geology of the site.</p> <p>Suggestion that only half the site be developed with the remaining land retained as a natural recreation space and wildlife haven.</p> <p>Potential for increased crime and anti-social behaviour due to increase in population.</p> <p>Sustainable location.</p> <p>The development will breathe new life into the area and provide much-needed infrastructure.</p>	
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112. FDLP SP2: Cheddar Drive

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Historic England - Have any impacts on St Lukes Church (Grade 2) and Silverdale conservation area been considered?</p>	<p>The Council has carefully considered the feedback received on the proposed allocation SP2: Cheddar Drive during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to SP2 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p>
<p>No details on infrastructure investment needed to support such a large increase of dwellings to Silverdale</p>	<p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> <p>Heritage and Character: Historic England raised concerns about potential impacts on St Luke’s Church (Grade II) and the Silverdale Conservation Area. Policy SE9 'Historic Environment' requires new development to conserve and, where possible, enhance the significance of heritage assets, including their settings. Any development proposal for SP2 will need to demonstrate, through a Heritage Impact Assessment (HIA), that it meets the requirements of this policy. Furthermore, SP2 requires the layout and design of the development to respond positively to local character and local distinctiveness, and that the design respects and enhances any significant views of designated and non-designated heritage assets. The Council will work with the applicant to ensure that the development is sensitive to the setting of the church and the Conservation Area and does not harm their character or significance.</p> <p>Infrastructure Capacity and Deliverability: Concerns were raised about the lack of detail regarding infrastructure investment to support the increased number of dwellings proposed for</p>

	<p>Silverdale. The Infrastructure Delivery Plan ED003 (IDP) identifies the infrastructure required to support new development across the Borough and sets out a collaborative approach to delivery. Any planning application will need to consider the provisions of Policy IN1 'Infrastructure' and demonstrate how it will contribute to the delivery of necessary infrastructure for the site and surrounding area. Further consultation with the Council will determine what requirements are necessary on a site-by-site basis including consideration of financial contributions from the development of the site towards the improvement of local facilities and services. In accordance with this, SP2 requires financial contributions towards improvements in the capacity of local schools and health facilities, to support new residents moving to the area. The Council will work with Staffordshire County Council, developers, service providers, and other stakeholders to ensure that adequate infrastructure is provided to support the proposed development. This includes considering the cumulative impact of all the proposed development in the Silverdale area and ensuring that cumulative impacts on infrastructure are addressed appropriately.</p> <p>The Council believes the allocation of SP2 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report.</p>
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113. FDLP SP22 Former Playground, Off Ash Grove

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Historic England - Have any impacts on St Lukes Church (Grade 2) been considered?</p>	<p>The Council has carefully considered the feedback received on the proposed allocation SP22: Former Playground, Off Ash Grove, during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to SP22 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Impact on St Luke's Church: Historic England raised concerns about the potential impact of the development on the setting of the nearby Grade II listed St Luke's Church. Policy SE9 'Historic Environment' requires development proposals to conserve and, where possible, enhance the significance of heritage assets, including their settings. Any development at SP22 must demonstrate compliance with this policy. In line with this and to ensure the setting of the church is protected, SP22 requires a Heritage Impact Assessment and states that the design of the development should not detract from the historic views of St Luke's Church. The Council will work with the applicant to ensure that the development is sensitive to the setting of the church and does not harm its character or significance. <p>The Council believes the allocation of SP22 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was</p>
<p>No details on infrastructure investment needed to support such a large increase of dwellings to Silverdale</p>	

	deemed suitable for development based on the assessment presented in the Site Selection Report ED029.
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114. FDLP SP23 Land at Cemetery Road

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Environment Agency – Risk of landfill gas migration to houses in such proximity to a landfill. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission. We would recommend extensive and detailed ground surveys and potentially restrictions on the construction methodology of any works near the landfill boundary. Consideration should be given to the Ground Conditions and Pollution section of the NPPF (paragraphs 183 to 188)</p> <p>Environment Agency – Nearby receptors have raised serious concerns regarding odour emissions from the site which are subject to on-going regulatory investigation and remediation measures.</p> <p>Environment Agency – Whilst the landfill is due to stop accepting waste by January 2027, the site will continue to receive restoration soils until 2042, meaning traffic movements to and from the site will remain until this date.</p> <p>Environment Agency – The landfill will continue to generate gas and leachate, which will need to be monitored and managed by the site owners for several years after closure. No operational landfill would be completely odour free, therefore, due to the proximity of the proposed site allocation, future residents are likely to experience unpleasant odours on occasions. Given the sensitivity of Walley’s Quarry we question the suitability of allocating additional housing sites in proximity of the landfill.</p> <p>Comments from other parties include: -</p>	<p>The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The site policy requirements also respond to comments raised in terms of confirming access arrangements into the site. In respect of the proximity of the site to Walleys Quarry, the site requirements note that no dwellings are expected to be occupied until the cessation of the disposal of non-hazardous waste on the site.</p> <p>The site requirements the direct provision of cycle and pedestrian routes from Cemetery Road to Keele Road. The allocation wording also requires the consideration of linkages between the site and the adjacent allocation SP11.</p> <p>The site policy requires the production of a number of technical studies / assessments including a heritage impact assessment, noise, land contamination, additional flood risk work to support the sites delivery.</p>

<p>Inappropriate location for housing given its proximity to Walley's landfill site and associated air pollution (odours).</p> <p>Impact on air quality – hydrogen sulphide emitted by Walley's Quarry, increased carbon dioxide generated by additional traffic, reduction in the number of trees and the low-lying nature of the area will all combine to further reduce air quality.</p> <p>Pollution and disruption whilst building takes place - years of dust, noise, contractor's traffic and general disruption to local residents.</p> <p>Loss of amenity (peace, quiet and privacy) for local the residents and the associated impact on their mental health and wellbeing.</p> <p>Loss of local green open / recreational space within walking distance of homes, resulting in detrimental impact on local people's physical and mental health / wellbeing, including an adverse impact on local obesity rates.</p> <p>Park Road, which is used by people for exercise (including the disabled, those less mobile and children travelling to school) would become dangerous.</p> <p>Devaluation of local properties.</p>	<p>The allocation seeks to support the infrastructure delivery plan through contributions towards improvements to local schools / health facilities, alongside contributions towards highway improvements from A525 to Whitmore Road, through the Keele University Sites and site TB19.</p> <p>The supporting information notes how the masterplan and layout of the site should take account of overhead powerlines across the site.</p>
<p><i>Social infrastructure:</i></p> <p>Loss of open / green / recreational space and playing fields on Back Lane</p> <p>Insufficient infrastructure - doctors, dentists, schools and other services which are already oversubscribed.</p> <p>Request that GP provision planning gain clauses be considered and implemented and also ring-fenced for specific health service space spend – if this does not occur the quality and access to general practice will slip</p>	

<p>further. Our buildings are at capacity but could be extended (Silverdale and Ryecroft Practice).</p> <p>An Infrastructure Plan is required – to include highway impacts and how essential services will be met (schools, medical facilities, post office etc).</p>	
<p><i>Transportation:</i></p> <p>Staffordshire County Council – Off-site improvements required to enhance cycle and pedestrian connectivity to Silverdale, Keele university and Newcastle Town Centre.</p> <p>Staffordshire County Council – Limited amenities / facilities available to serve large scale development. Inclusion of supermarket and bus services should be considered to support the residential development.</p> <p>Staffordshire County Council – Development will need to be supported with a Travel Plan and a Transport Assessment, in line with any scoping note agreed with the Highway Authority.</p> <p>Other transport comments from other parties include:</p> <p>Concern regarding increased traffic – resulting in reduction in road safety and congestion / overloading of already busy local roads.</p> <p>Existing road system inadequate – already under pressure due to other new developments in the area (the Hawthorns – c.80 new homes, the Oaks – c.100 new homes and the Hamptons – c. 130 new homes); in a poor state of repair; and unsuitable to accommodate the additional volume of traffic and / or construction-related vehicles.</p> <p>Concern regarding the location of access onto Park Road and associated reduction in road safety (Park Road is used by people for exercise and children travelling to school).</p>	

<p>On-street parking is already an issue in Silverdale village with parking at local amenities (the parade shops and doctors' surgery) already at capacity, with elderly people often struggling to find somewhere to park when shopping / visiting the GP.</p> <p>Public transport inadequate, resulting in people using their cars; new residents likely to commute to major cities for work; and loss of local open space, forcing people to travel to other areas for recreation.</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Environment Agency – Development in proximity of landfill may present a risk to controlled water receptors. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission.</p> <p>Other water, drainage and flood risk comments from parties include: -</p> <p>Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries).</p> <p>Increased flood risk – the site is a waterlogged field which constantly has water running off it. Ground water and springs will naturally re-route downwards towards Park Road / Silverdale (Cemetery Road and Silverdale Road have already flooded many times in recent years).</p> <p>The Level One Strategic Flood Assessment shows a flood risk to the Silverdale Brook area and page 62 of the FRA (2008) states “the Silverdale area of the Borough where there have been reports of groundwater flooding ... this remains a long-term risk as pumping and de-watering of the mines will have to occur in perpetuity. It is therefore recommended that future development in this location is avoided due to the residual risk posed”.</p>	

<p>The importance of trees on the site for balancing the hydrology of the surface water with underground aquifer pressure - there should be a Hydrogeological Study to calculate the change to the water equilibrium.</p>	
<p><i>Biodiversity:</i></p> <p>Loss of trees and green space resulting in wildlife / habitat loss (a diversity of insects and butterflies, woodpeckers, buzzards, squirrels, foxes, badgers) = net loss in biodiversity.</p> <p>Loss of streams / drainage channels along Park Road, which are home to a range of wildlife, in particular, amphibians, toads, frogs and newts.</p> <p>Jobs Wood is ancient woodland (which cannot be replaced) and includes protected native flora such a bluebell, marsh marigolds and wood anemones.</p> <p>Removal of mature trees will reduce air quality, increase flood risk and reduce natural carbon capture / the existing woodland should form part of the development brief for the site.</p> <p>No ecological surveys have been carried out.</p> <p>Negative impact on land & soil.</p> <p>The UK is one of the most, if not the most, nature-depleted countries in Western Europe.</p> <p>Natural England guidance states that no developments should be permitted near 'protected sites' unless it can be proved that they are nitrate and phosphate neutral.</p>	
<p><i>Character:</i></p> <p>Significant impact on landscape sensitivity and the character and setting of the historic village of Silverdale.</p>	

<p>Urban sprawl will essentially join Silverdale with Keele, thereby removing the character and distinctiveness of each, contrary to SO-XIII, which states that the vitality of industrial villages should be supported, and their special character preserved and enhanced. The proposed developments, which will double the size of Silverdale, will undermine its historical character as a village 'nestled in a green valley'.</p> <p>Historic England – Consider impacts on Keele Hall Registered Park and Garden Grade II and associated listed buildings.</p>	
<p><i>Green Belt:</i> 'Major' harm to Green Belt (overall, the proposals will reduce greenbelt by 25 per cent in Silverdale alone, in perpetuity).</p> <p>Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement).</p> <p>The purpose of the Greenbelt is to check unrestricted sprawl, to safeguard the countryside from encroachment and to preserve setting. This development will merge Poolfields with Keele and Silverdale creating one large urban conurbation which the Green Belt was designated to prevent.</p> <p>The methodology adopted in the Green Belt Review where 'historic towns' are given an enhanced status ignores the complex industrial history elsewhere, i.e. historic industrial villages.</p> <p>No exceptional circumstances to justify changes to Green Belt designations.</p> <p>Government policy is to not remove land from the Green Belt for house building.</p>	

<p>Development of the site would not unacceptably harm the Green Belt – the site has strong and defensible boundaries and is visually contained due to local topography; it would not result in unrestricted urban sprawl into the open countryside or the coalescence of settlements and would not set a precedent for further development to the west of the University campus.</p> <p>Should site SP11 be confirmed, this site would comprise logical infill</p>	
<p><i>Deliverability:</i></p> <p>The site promoters are willing to work positively with the Council to deliver a masterplan-led approach to ensure a high quality, sustainable development, to include green infrastructure, on-site open space and the stated 200 homes.</p> <p>The owner has confirmed their intention of engaging with potential developers to ensure that the site is deliverable within the Plan period.</p>	
<p><i>Other:</i></p> <p>Over-concentration / disproportionate volume of housing proposed in the area - the net increase in population suggested at Keele, Silverdale and one of the developments on the Keele / Thistleberry boundary would add over 2,000 houses, amounting to approximately 4,400 more people, which is unfair in a tightly defined area / the volume of additional population will increase density in Silverdale to 22 pph (only 6.6 pph in the rest of the Borough – using the same assumptions).</p> <p>Silverdale should be afforded the same protection as a rural village due to its importance as an industrial village.</p> <p>More sustainable brownfield and underused sites, the town centre and unused retail and commercial premises should be redeveloped before green field sites (also, there are empty properties of all kinds which could be redeveloped for housing).</p>	

<p>The Council should be pro-active in seeking out locations that are redundant and work with owners to tackle the neglect.</p> <p>No housing need – based on inaccurate data and an overly optimistic view of job growth in the Borough; the population of Newcastle is falling; there are many vacant homes in the Borough (1,200 – which are unusable and require investment); Government housing targets have been reduced / changed from statutory to advisory; there is an oversupply of housing in England and Wales.</p> <p>Loss of agricultural / grazing land – for potential food or energy production in the future.</p> <p>The site may have underground mines (the historic mine at Knutton Manor had shafts sunk close to Park Road), be a former landfill site, or otherwise be contaminated.</p> <p>Concern regarding underground mines and the impact that construction works (digging, vibrations etc) would have on existing buildings (i.e. loosening of soil / substrate underground that rain or spring water may wash away over time, causing sink holes, for example).</p> <p>No explanation given for the different densities on sites SP11, SP12 and SP23 (which appear to be based on site ownership rather than sound planning grounds).</p> <p>Contrary to the Council’s stated aim of helping to combat climate change Negative impact on mineral safeguarding.</p> <p>The opinions of local people in Silverdale and Keele have not been taken into account.</p>	
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<p>Suggestion that only half the site be developed with the remaining land retained as a natural recreation space and wildlife haven.</p> <p>The development will breathe new life into the area and provide much-needed infrastructure.</p> <p>The site is situated in a highly sustainable location and forms an important component of the Council's overall development strategy, providing a strategic link between the growth of the urban area and the growth of Keele University and Science Park.</p> <p>The site could deliver a mix of housing - traditional family housing, 'starter homes' and 30% affordable housing - providing a range of housing opportunities for those with links to the University (graduates, research students and university professionals), thereby reducing distances travelled to work.</p> <p>The scale of development should be reduced to an acceptable level to retain Boggs Wood and preserve the existing vegetation and bluebells for future generations to continue enjoying.</p>	
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115. FDLP TB19 Land South of Newcastle Golf Club

Summary of Main Issues Raised	How the main issues have been taken into account
Whitmore Road has heavy traffic – will require traffic mitigation measures including speed limitation measures	The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.
Traffic volume and safety concerns of site proposal on Whitmore Road and Seabridge Lane	
Access constraints, particularly on A53	
Lack of local amenities and infrastructure near to development	The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.
Increased pollution from development when the area already suffers with Walley's Quarry	
Environment Agency - Presence of unmodelled watercourses within the plan area which presents a flood risk that needs to be investigated. Opportunities for flood risk and ecological betterment/ water quality enhancement should be fully investigated and implemented.	
These landforms open countryside forming the buffer between the established residential areas of Westlands and Seabridge and the predominantly open countryside of Butterson and Whitmore.	The site policy requires several assessments including a heritage impact assessment, flood risk, noise and geo-environmental survey, to support the delivery of the site.
Loss of Green Belt objected too.	
Combined with the other sites for potential allocation (SP11 etc.), there is no demand for this number of houses so no justification for greenbelt	The Site provides for a significant area of landscaping to the western extent of the site alongside appropriate buffers to ecological areas including Pie Rough, Hands Wood and Barkers Wood Biodiversity alert areas, amongst others.
Brownfield sites closer to town centre	
Reduced biodiversity and loss of wildlife	
Amenity impacts from wind turbines and proximity to M6	The site has been considered through the Infrastructure Delivery Plan and Strategic Transport Assessment which has identified the need for financial contributions to local schools and health facilities alongside a direct link road to facilitate connection to the A525 Keele Road.
Flooding impacts, particularly surface water impacts	
A new wildlife corridor should be created up to the golf course.	
Reduce the number of houses from 500.	The supporting text to the policy allocation identifies the presence of overhead powerlines which will influence the layout and design of the proposed development site.
National Highways - Further assessment required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would like to be consulted on this.	
Historic England - Several heritage assets to consider, including Trentham Gardens Registered Park and Garden Grade II*, Hargreaves Lodge Grade	

II, many listed buildings around Trentham, Hanchurch and off Whitmore Road.	
Affordable housing – question the need for	
Sport England - Development needs to be appropriately designed so that it would not prejudice the use of the adjacent golf course or place unreasonably restrictions on the facility in line with NPPF paragraph 187	
Should this site go forward, it is contradictory to Government's statements on prioritising brownfield sites.	
Field is home to protected wildlife	
The existing storm drains that run under Guernsey Drive would not take any additional surface water.	
Infrastructure is required to connect the site across to Keele university to prevent vehicles then driving the long way round via Sneyd Avenue.	
This development should include dedicated pedestrian and cycle paths to Keele University.	
This proposal has been rejected a few times – what is changed?	
The scale of the development impacts the character of the area.	
Woodland	
Proximity to Keele Hall Registered Park and Gardens	
The development should be sympathetic to the area	
Infrastructure is required to connect the site across to Keele University to prevent vehicles then driving the long way round via Sneyd Avenue	
Staffordshire County Council - Off-site improvements required to implement speed limit reduction scheme along A53, enhance cycle and pedestrian connectivity to built-up area to the east, Keele university (west) and Newcastle Town Centre (Northeast). Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority. A Travel Plan will be required to support the development.	
Natural England - A water course within the site is upstream of King's & Hargreaves Woods SSSI and runs through the SSSI. Drainage from the site could impact the SSSI. The site partly includes and is adjacent to	

Springpool Wood Site of Biological Importance and is adjacent to Hands Wood and Pie Rough Biodiversity Alert Site.	
Site promotor notes that the site is deliverable, suitable and achievable and supports allocation in the Plan	
National Grid Electricity Distribution - The plan acknowledges the need for a masterplan led approach. However, the policy text makes no reference to the 132kV overhead line (part of NGED's Barlaston Circuit) which runs through the centre of the site, roughly north to south. The overhead line represents essential infrastructure to the delivery of electricity to homes and businesses in Newcastle-Under-Lyme and the wider area. This needs to be mentioned in a masterplan	
Keele Parish - It is not clear whether there will be direct access to the University Road network, but we are assured that the University will not permit a through route to the A525, as this would cause even more congestion at peak times on access to and journeys through the campus.	

116. FDLP TB23 Land West of Galingale View

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Environment Agency - Risk of landfill gas migration to houses in such proximity to a landfill. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission. We would recommend extensive and detailed ground surveys and potentially restrictions on the construction methodology of any works near the landfill boundary. Consideration should be given to the Ground Conditions and Pollution section of the NPPF including paragraphs 183 to 188.</p> <p>Environment Agency - Nearby receptors have raised serious concerns regarding odour emissions from the Walley's Quarry landfill site which are subject to on-going regulatory investigation and remediation measures.</p> <p>Environment Agency - Whilst the landfill is due to stop accepting waste by January 2027, the site will continue to receive restoration soils until 2042, meaning traffic movements to and from the site will remain until this date.</p> <p>Environment Agency - The landfill will continue to generate gas and leachate, which will need to be monitored and managed by the site owners for several years after closure. No operational landfill would be completely odour free, therefore, due to the proximity of the proposed site allocation, future residents are likely to experience unpleasant odours on occasions. Given the sensitivity of Walley's Quarry we question the suitability of allocating additional housing sites in proximity of the landfill.</p> <p>Other comments from other parties include: Inappropriate location for housing given its proximity to Walley's landfill site and associated air pollution (odours) / development at 'The</p>	<p>The Council acknowledges the concerns raised during the Regulation 18 consultation regarding the proposed allocation of TB23: Land West of Galingale View. These concerns have been carefully considered in preparing the Regulation 19 Local Plan. While concerns were raised about the site's proximity to Walley's Quarry, the potential impact on the Green Belt, and the capacity of existing infrastructure, the site's proximity to the existing settlement boundary and its ability to accommodate a mix of housing, including affordable housing, make it a suitable location for residential development.</p> <p>Addressing Concerns about the Impact of Walley's Quarry: The Council recognises the concerns regarding the potential impacts of Walley's Quarry on the proposed development at TB23, particularly regarding odour, air quality, and landfill gas migration. The Environment Agency (EA) has highlighted these concerns, noting the ongoing regulatory investigations and remediation efforts at the landfill site. The Council has implemented several measures in the Regulation 19 Plan to mitigate these risks:</p> <ul style="list-style-type: none"> • Policy SE1 'Pollution and Air Quality': This policy requires new development to minimise air pollution and to address the cumulative effects of emissions from proposed development alongside other existing sources of air pollution. It also mandates that new developments not lead to significant adverse effects on public health, the environment, or amenity from polluting emissions or odours. The policy promotes sustainable transport modes, encourages the use of low-emission vehicles, and supports the increased provision of electric vehicle charging infrastructure, all of which would help to reduce the overall impact of traffic-related emissions in the area. • Policy SE2 'Land Contamination': This policy requires assessment and remediation of contaminated land, including the consideration of the potential for flood events to exacerbate

<p>Hamptons' initially refused planning permission by the Council on the grounds of odour.</p> <p>Concern regarding loss of visual amenity and potential loss of light / overshadowing of adjacent houses.</p> <p>Increase in noise, pollution, disturbance and danger from increased traffic.</p> <p>Detrimental impact on air quality, particularly from dust and vehicle emissions caused by increased traffic (proximity limits to main roads should be set, as for landfill sites).</p>	<p>contamination risks. The policy also encourages the use of the National Quality Mark Scheme for Land Contamination Management and incorporates elements of the Land Contamination Risk Management (LCRM) framework.</p> <ul style="list-style-type: none"> • Site-Specific Requirements for TB23: The site-specific policy for TB23 requires the submission of a comprehensive Environmental Statement with any planning application. This statement must include: <ul style="list-style-type: none"> ○ A detailed assessment of the potential risks from landfill gas migration, odour, and air quality, informed by extensive and detailed ground surveys and taking into account the EA's recommendations. ○ A mitigation strategy that outlines measures to address these risks, including potential restrictions on the construction methodology of any works near the landfill boundary. <p>The Council will work with the applicant and the EA to ensure that the development is designed and built in a way that minimises any adverse impacts on amenity and the environment related to the landfill.</p> <p>Balancing Development with Green Space Preservation: The Council has undertaken a thorough assessment of the site and has concluded that the benefits of allocating TB23 for residential development, including the provision of much-needed housing and the opportunity to deliver new and accessible open space and green infrastructure, outweigh the harm to the Green Belt. The site's location, adjacent to the existing settlement boundary of Newcastle, also minimises encroachment into the open countryside and helps to preserve the Green Belt's function of preventing urban sprawl.</p> <p>Addressing Concerns about Infrastructure Capacity: The Council acknowledges the concerns regarding the capacity of existing infrastructure and services in the area. The Infrastructure Delivery Plan ED003 (IDP) identifies the infrastructure needed to support new development and outlines a collaborative approach to delivery. In relation</p>
<p>Social infrastructure: Insufficient infrastructure - schools, GP surgeries and other services which are already oversubscribed.</p> <p>Loss of open / green space.</p> <p>The development will deliver new and accessible multi-functional open spaces, amenity spaces, green infrastructure and improved connectivity via green corridors through the site.</p>	
<p>Historic England - consider heritage assets within the vicinity including Keele Hall Registered Park and Garden Grade II.</p>	
<p>Transportation: Staffordshire County Council -Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority.</p> <p>Staffordshire County Council - A Travel Plan will be required to support the development.</p> <p>Other transport related comments include:</p>	

<p>Concern regarding increased traffic - resulting in reduction in road safety and congestion / overloading of already busy local roads</p> <p>Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic (some still not adopted by the Council)</p> <p>Inadequate public transport (resulting in people continuing to use their cars)</p> <p>Satisfactory vehicular access can be achieved</p> <p>Excellent transport connectivity - excellent access to the strategic highway network and well served by public transport (regular bus services to Newcastle-under-Lyme, Stoke, Crewe, Nantwich and Stoke-on-Trent railway station with on-going travel by rail available to Crewe, Manchester, Birmingham, London etc)</p>	<p>to TB23, the IDP identifies the need for contributions towards improvements to local schools, health facilities, and transport infrastructure. The Council will work with developers, Staffordshire County Council, and other relevant agencies to ensure that the development is supported by adequate infrastructure and that the necessary improvements are delivered in a timely manner.</p> <p>Water, Drainage, and Flood Risk:</p> <p>The EA has highlighted the potential risk of contamination of controlled water receptors due to the site's proximity to the landfill. Policy SE5 'Water Resources and Water Quality' requires development to avoid unacceptable impacts on water quality and to contribute positively towards the objectives of the Water Framework Directive (WFD). In relation to TB23, a detailed assessment will be required to address the potential impacts of development on groundwater and to identify appropriate mitigation measures to protect controlled water receptors.</p>
<p><i>Water, drainage & flood risk:</i></p> <p>Environment Agency - Development in proximity of landfill may present a risk to controlled water receptors. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission.</p> <p>Comments from other parties include</p> <p>Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries)</p> <p>Unsuitable allocation due to flood risk/located within Flood Zones 2 and 3</p> <p>Increased risk of flooding due to 'run-off'</p>	<p>The Council will work with the applicant, the EA, and other relevant agencies to ensure that the development meets the requirements of Policy SE5 and does not adversely affect the groundwater environment. The Council also acknowledges the concerns regarding the site's location within Flood Zones 2 and 3, which could pose a risk of flooding. A comprehensive FRA will be required to be submitted with any planning application for development on the site. The FRA must demonstrate how the proposed development will not increase flood risk elsewhere and will be safe for its intended lifetime, incorporating appropriate mitigation measures.</p> <p>Biodiversity:</p> <p>The Council recognises the concerns about the potential loss of biodiversity associated with the development. Policy SE7 'Biodiversity Net Gain' requires all new developments to achieve at least a 10% net gain in biodiversity, and Policy SE8 'Biodiversity and Geodiversity' requires</p>
<p><i>Biodiversity:</i></p>	

<p>Loss of high quality natural and semi-natural greenspace, trees, diverse flora and natural habitats to a range of fauna (including lizards and owls, bats, newts and woodpeckers - all of which are protected species) = net loss in biodiversity.</p> <p>Loss of natural carbon capture.</p> <p>The site currently comprises low value grassland and its development will support biodiversity enhancement through the protection and enhancement of existing features of the site, including mature tree belts and the creation of new habitats for a range of species.</p>	<p>development to avoid adverse impacts on a range of features, including protected species.</p> <p>In relation to TB23, the Council will work with the applicant to ensure that the development incorporates measures to protect and enhance biodiversity, including the retention of existing mature tree belts, the creation of new habitats, and the provision of green corridors to improve connectivity.</p>
<p><i>Character:</i></p> <p>Unsuitable allocation due to impact on landscape.</p> <p>Consider heritage assets within the vicinity, including Keele Hall Registered Park and Garden Grade II (Historic England).</p>	
<p><i>Green Belt:</i></p> <p>'Major' harm to the Green Belt.</p> <p>Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement).</p> <p>The urban area of Newcastle will expand and encroach into Keele and Silverdale resulting in urban sprawl.</p>	
<p><i>Deliverability / Viability:</i></p> <p>Persimmon consider that there are no environmental or technical constraints to development of the site, subject to suitable mitigation / a sensitive approach to design and that the site is available, suitable, achievable, viable and deliverable (at a reduced capacity of 103 dwellings).</p> <p>Persimmon is committed to the site and consider that it could be brought forward in the Local Plan period.</p>	

<p>Potentially a former mining or landfill site (i.e. contaminated).</p>	
<p><i>Other:</i> Only brownfield sites should be developed with all of the green areas in the local plan retained in their present use.</p> <p>No housing need – the Borough has exceeded its housing targets in recent years and that recent data ('Housing crisis fact check', Community Planning Alliance) indicates that “there are 1.5 million more dwellings than households” in England and Wales alone / there are more than 1,000 empty homes in Newcastle Borough.</p> <p>Potential increase in anti-social behaviour in the area due to increase in population / likelihood of student houses in the area.</p> <p>Loss of agricultural land / decrease in food production capacity.</p> <p>Sustainable location – within the settlement boundary, naturally linked to existing development, would contribute to a sustainable pattern of development, served by a range of existing services and facilities, and strategically located to support key employers in the area (such as Keele University).</p> <p>The allocation will deliver a range of economic benefits to the local area and cutting-edge net-zero technologies through the design, construction and operation of new homes.</p> <p>Looks like a rational proposal given the existing infrastructure.</p> <p>Support on the grounds that housing and affordable housing is needed for local people.</p>	

117. FDLP TB6: Former Pool Dam Pub Site

Summary of Main Issues Raised	How the main issues have been taken into account
<p><i>Character:</i> Historic England - No designated heritage assets nearby.</p>	<p>The Council has considered the feedback received on the proposed allocation of TB6: Former Pool Dam Pub Site during the Regulation 18 consultation. The Regulation 19 Local Plan allocates the site for residential development, recognising its potential to deliver new homes in a sustainable location within the urban area. The site's redevelopment for housing aligns with the site selection methodology and reflects the need for additional housing in the Borough as identified in the Housing and Economic Needs Assessment ED001 (2024).</p> <p>Character and Heritage: Historic England confirmed that there are no designated heritage assets in the immediate vicinity of the site, and the Council will continue to monitor the site for potential archaeological discoveries during the development process. Policy SE9 'Historic Environment' will guide any development to ensure that it is sensitive to the character of the surrounding area and does not harm any non-designated heritage assets that may be present.</p> <p>Alternative Uses and Housing Need: Policy SE6 'Open Space, Sports and Leisure Provision' guides the provision of open space, including allotments, and the Council will continue to explore opportunities to provide additional allotment provision in the Borough, where appropriate. However, the site selection process and the Housing and Economic Needs Assessment (2024) demonstrate that there is a need for additional housing in the Borough, and the allocation of TB6 contributes towards meeting that need.</p> <p>Site Suitability: The Council agrees with the feedback that the site is a rational proposition for development, given its location within the existing settlement boundary and its proximity to existing infrastructure. The site is well-suited for residential development, and its redevelopment will enhance the character and appearance of the area.</p> <p>Transportation and Parking:</p>
<p><i>Other:</i> No housing need - there are enough houses</p> <p>The land should be allotments for local residents as there are none in Poolfields</p> <p>Looks like a rational proposal given the existing infrastructure</p>	

	<p>While not explicitly mentioned in the feedback, the Council acknowledges that new development can generate additional traffic and increase demand for parking. Policy IN2 'Transport and Accessibility' promotes sustainable transport modes, while Policy IN3 'Access and Parking' requires developments to consider appropriate parking provision to minimise adverse impacts on the surrounding road network and residential amenity. As part of any planning application for TB6, the Council will consider a Transport Statement and a Parking Assessment to determine the development's impact on traffic and parking, ensuring it is consistent with these policies.</p>
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118. FDLP TC22: Marsh Parade

Summary of Main Issues Raised	How the main issues have been taken into account
Staffordshire County Council - Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority. A Travel Plan will be required to support the development.	<p>The Council has carefully considered the feedback received on the proposed allocation TC22: Marsh Parade, during the Regulation 18 consultation. The Regulation 19 Local Plan allocates this site for a mixed-use development, recognising its potential to revitalise a key area within Newcastle Town Centre. The site-specific policy reflects the council's commitment to working with stakeholders, to deliver a scheme that addresses transportation and heritage concerns while providing a balance of uses to enhance the town centre's vitality and vibrancy.</p> <p>Addressing Transportation and Accessibility: Recognising the importance of sustainable transport, Policy IN2 'Transport and Accessibility' promotes a shift away from car dependency, encouraging the use of walking, cycling, and public transport. The Council will pay particular attention to ensuring that the development provides sufficient on-site parking to meet the needs of future residents and businesses, minimising the potential for overspill parking onto Hassell Street and in the surrounding area.</p> <p>Protecting the Historic Environment: The Council acknowledges Historic England's concerns regarding the potential impact of development on the nearby Stubbs Walk Conservation Area and the listed buildings on Marsh Parade. Policy SE9 'Historic Environment' requires development proposals to conserve and, where possible, enhance the significance of heritage assets, including their settings.</p> <p>The site-specific policy for TC22 requires the submission of a Heritage Impact Assessment (HIA) to accompany any planning application. The HIA must demonstrate that the proposed development will not harm the character or significance of the Conservation Area or the listed buildings and must propose measures to mitigate any potential impacts.</p>
Historic England - Consider impacts on Stubbs Walk Conservation Area, consider impact on listed buildings on Marsh Parade.	
This site is currently at pre-application stage, and the site has already been cleared. Revised planning drawings are currently being prepared following receipt of SPCG comments. Aspire Housing anticipate submitting a planning application during the first quarter of 2024.	
Anything developed here must have dedicated and adequate parking to prevent even more inappropriate parking on Hassell Street and in this general area.	

	The Council is committed to delivering a mixed-use scheme at TC22: Marsh Parade that respects the local heritage, enhances the town centre, and provides a vibrant and sustainable environment for residents, businesses, and visitors.
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119. [FDLP TC40: Car Park, Blackfriars](#)

Summary of Main Issues Raised	How the main issues have been taken into account
Staffordshire County Council - The Town Centre Car Park rationalisation strategy must be supported in any planning application submission for the redevelopment of public car parks, demonstrating that alternative local provisions are available to prevent on-street and indiscriminate parking on the local highway network.	The council has carefully considered the feedback received on the proposed allocation, during the Regulation 18 consultation. This feedback, along with the findings of the updated technical assessments, has informed the final site allocation and associated policy requirements in the Regulation 19 Local Plan.
Historic England - Consider impacts to Newcastle Town Centre Conservation Area, Old Orme Boys School Grade II.	<p>The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>The site policy requires a heritage impact assessment alongside a desk based archaeological assessment.</p>

120. FDLP TC45 York Place

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Staffordshire County Council - Delivery/ Service Management Strategy required to support development to permit off-peak loading/ unloading on Merrial Street. The site will need to contribute towards the Staffordshire County Council Walking and Cycling Improvement Plan.</p>	<p>The Council has carefully considered the feedback received on the proposed allocation TC45: York Place during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to TC45 in the Regulation 19 Local Plan. The council has published a site selection report ED029 alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p>
<p>Historic England - Within Newcastle Town Centre Conservation Area and a number of nearby listed buildings, will need to consider impact.</p>	<p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Transportation and Servicing: Staffordshire County Council raised concerns about the need for a Delivery/Service Management Strategy to manage loading and unloading on Merrial Street and to ensure the development contributes to the Local Cycling and Walking Infrastructure Plan (LCWIP). Policy TC45 addresses these concerns by requiring a Delivery/Service Management Strategy be submitted with any planning application, specifying that it must allow for off-peak loading/unloading on Merrial Street to minimise traffic disruption during peak hours. TC45 also requires the development to enhance cycle and pedestrian connectivity in accordance with Policy IN4 'Cycleways, Bridleways, and Public Rights of Way' and to contribute towards the LCWIP. This integrated approach aims to promote sustainable transport and improve accessibility within the town centre. A Transport Statement, as required by Policy SA1, might also consider further measures to support sustainable travel to and from the site. Heritage and Conservation Area: Historic England highlighted that the site is within the Newcastle Town Centre Conservation

	<p>Area and near several listed buildings. Policy SE9 'Historic Environment' requires development proposals to conserve and, where possible, enhance the significance of heritage assets, including their settings. TC45 requires a Heritage Impact Assessment (HIA) to be submitted with any planning application, this HIA must demonstrate that the development will not harm the character or significance of the Conservation Area and should consider views of nearby heritage assets. TC45 also requires an archaeological desk-based assessment of the site in line with national policy and best practice, ensuring any potential impact on archaeological remains are assessed and mitigated accordingly. These measures will help to ensure that any development respects the historic context and does not harm nearby listed buildings.</p> <p>The Council believes the allocation of TC45 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report.</p>
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121. FDLP TC7: Land bound by Ryecroft

Summary of Main Issues Raised	How the main issues have been taken into account
<p>Staffordshire County Council - Vehicular and pedestrian access available via Liverpool Road, Corporation Street, Merrial Street, and Ryecroft. Off-site footway/cycleway infrastructure improvements required along Corporation Street to enhance sustainable travel links in accordance with LCWIP. Direct pedestrian/cycle route between A52 Ryecroft Toucan Crossing and Merrial Street/Corporation Street to be secured by the internal layout to improve connectivity to the town centre. Hard parking measures to be applied for residential development due to Air Quality concerns. Parking survey will need to be undertaken to confirm the current usage of the public parking provision and demonstrate that any usage can be displaced/ accommodate on site without giving rise to any highway safety issues/ indiscriminate parking. Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority. A Travel Plan will be required to support the development.</p>	<p>The Council has carefully considered the feedback received on the proposed allocation TC7: Land bound by Ryecroft during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to TC7 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Transportation and Accessibility: Staffordshire County Council provided detailed feedback on transportation and access arrangements for the site. TC7 addresses these points by: <ul style="list-style-type: none"> Specifying vehicular and pedestrian access via Corporation Street and Ryecroft. Requiring off-site footway/cycleway infrastructure improvements along Corporation Street to enhance sustainable travel links in accordance with the LCWIP with the intention that these works enhance the public realm. Requiring a direct pedestrian/cycle route between the A52 Ryecroft Toucan Crossing and Merrial Street/Corporation Street to be secured by the internal layout to improve connectivity to the town centre. Requiring a Transport Assessment (TA) and a Travel Plan (TP) for any planning application, to further assess and mitigate any potential transport impacts, and to demonstrate that the development will not adversely affect the local road network.
<p>Historic England - Need to consider impacts on Newcastle Town Centre Conservation Area and a number of listed buildings in the area.</p>	
<p>McCarthy Stone supports the proposed Strategic Centre (Town) allocation TC7 in Newcastle, which has the capacity to deliver 75 units and 1.63Ha of employment land. The Draft Local Plan suggests this allocation should be masterplan led, with flexible policy wording to allow planning applications that align with the allocation without prejudice to the rest of the allocation. McCarthy Stone supports policies promoting a mix of housing types and sizes, including aspirational, well-designed, and adaptable housing, and ensuring housing is suitable for older people.</p>	
<p>Aspire currently have an interest in several sites, some of which are identified as proposed allocations including TC7.</p>	

	<ul style="list-style-type: none"> ○ Implementing hard parking measures for residential development to address air quality concerns arising from potential increases in traffic congestion, in accordance with Policy IN3. This will likely involve a Parking Survey to confirm existing parking capacity and ensure that on-site provision can accommodate demand without adverse effects on the highway network. • Heritage and Conservation Area: Historic England highlighted the site's location within the Newcastle Town Centre Conservation Area and the presence of nearby listed buildings. TC7 addresses this through the following requirements: <ul style="list-style-type: none"> ○ A Heritage Impact Assessment (HIA), informed by the Historic Environment Record, must be submitted with any planning application, demonstrating that the development will not harm the character or significance of the Conservation Area or listed buildings, and that opportunities are sought to enhance heritage assets. ○ Development must be sympathetic to the area's heritage and avoid altering the historic street pattern or key views. ○ An archaeological desk-based assessment is also required to investigate potential archaeological impacts. ○ Development within the Newcastle Town Centre Conservation Area must demonstrate that the proposals comply with policy SE9 'Historic Environment' and preserve or enhance the significance of the conservation area. • Supporting Mixed-Use Development: The Council acknowledges McCarthy Stone's support for the allocation and the proposed mix of housing and employment uses. The site is allocated for 75 residential units and 1.63 hectares of employment land. The Council also notes Aspire Housing's interest in the site.
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	<p>The Council believes the allocation of TC7 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report ED029.</p>
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122. FDLP TK10: Land at Crown Bank

Summary of Main Issues Raised	How the main issues have been taken into account
Where would access come from? Pitt Lane is too narrow which would constrain access.	<p>The Council has carefully considered the feedback received on the proposed allocation TK10: Land at Crown Bank during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to TK10 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> • Access and Transportation: Concerns about access via Pitt Lane, due to its narrow width and the potential for increased traffic, have been considered. Policy TK10 specifies that access to the development will be from Pit Lane. This is supported by the technical assessments undertaken for the Plan which deemed access suitable, subject to potential off-site highway works and junction improvements to ensure safe and efficient access. Any planning application for TK10 will be required to submit a Transport Assessment (TA) demonstrating compliance with Policy IN2 'Transport and Accessibility' and addressing the potential impact on traffic and the road network. A detailed assessment of the capacity of Pitt Lane and the surrounding road network will inform the TA and determine the need for any off-site highway works. Policy TK10 also requires contributions to improvements to Talke Signals (A34 Newcastle Road /Congleton Rd / Coalpit Hill). This aims to mitigate the increased traffic movements and minimise impact on the strategic road network.
Development would add to traffic build up on Pitt Lane	
Land has been assessed as high-risk mining area, and the water pollution from the abandoned mines could pollute Talke conservation area	
TK10 runs alongside Talke conversation area therefor development will affect rural character and heritage	
Next to Parrot's Drumble nature reserve, TK10 would disrupt the wildlife that reside there and affect the rural landscape / character	
Brownfield sites in the area, why are greenfield sites such as TK10 being considered?	
Objection as site is in the Green Belt	
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	
Historic England - Consider impact on Talke Conservation Area, Church of St Martin Grade II and other nearby heritage assets.	

	<ul style="list-style-type: none"> Environmental Concerns: The potential for water pollution from historic mine workings to affect Talke Conservation Area, the site's proximity to Parrots' Drumble Nature Reserve, and its impact on the rural landscape and character have been considered. The site is located adjacent to both Talke Conservation Area and Parrots' Drumble. Policy SE2 'Land Contamination' requires a coal mining risk assessment and a land contamination assessment to be undertaken prior to development to mitigate any potential risk due to development of the site. Policy SE14 'Green and Blue Infrastructure' promotes the creation of buffer zones around Local Nature Reserves to protect them from adverse impacts. A landscape buffer is required by TK10 to help to mitigate the development's impact on the adjacent nature reserve, as well as preserve views of St. Martin's Church. This buffer would also serve to mitigate the impact of the site's location adjacent to Talke Conservation Area and reduce any harmful effects. The design of any approved scheme would be required to respond positively to the rural landscape and wider character of the area, having considered the Landscape and Settlement Character Assessment. Green Belt and Housing Need: The site is within the Green Belt, and the Council acknowledges the objections to its release for development. The Local Plan recognises the importance of protecting Green Belt land, as highlighted by policy PSD5. The allocation of the site has been carefully considered against the five purposes of the Green Belt, including safeguarding the countryside and preventing urban sprawl, and the need for housing. The Council has concluded that the benefits of allocating the site for residential development, including its contribution to meeting local housing need, outweigh the harm to the Green Belt. The Council has also considered alternative sites both within and outside of the Green Belt but have concluded that TK10
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	<p>offers a sustainable location for development that will help to create a more balanced and vibrant community in Talke.</p> <ul style="list-style-type: none"> • Infrastructure Capacity: The Council acknowledges the concerns about the ability of existing infrastructure and services in Talke to accommodate the increased demand from new housing. The Infrastructure Delivery Plan (IDP) identifies the infrastructure needed to support new development and sets out a collaborative approach to delivery. TK10, in accordance with Policy IN1 'Infrastructure', requires financial contributions towards improvements to local schools and health facilities. The policy also states that mature trees on site should be retained and provide for a buffer to the east of the site. These requirements should ensure that any landscape or ecological impacts of the site are appropriately mitigated. This recognises that existing services are already under pressure and aims to ensure that adequate provision is made for new residents. The Council will work collaboratively with Staffordshire County Council, developers, service providers, and other stakeholders to ensure that sufficient capacity is provided to meet the needs of both new and existing residents. <p>The Council believes the allocation of TK10 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report ED029.</p>
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123. FDLP TK17: Land off St Martins Road

Summary of Main Issues Raised	How the main issues have been taken into account
The development will severely affect traffic through the village.	<p>The Council has carefully considered the feedback received on the proposed allocation TK17: Land off St Martins Road during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to TK17 in the Regulation 19 Local Plan. The council has published a site selection report ED029 alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Traffic and Road Network: The Council acknowledges the concerns raised about the potential impact of the development on traffic volumes and road safety in the area, specifically the potential for increased congestion and deterioration of existing roads. Policy TK17 requires any planning application to be supported by a Transport Assessment (TA), which will help address traffic and highway safety concerns. Policy IN2 'Transport and Accessibility' and Policy IN3 'Access and Parking' provide further guidance on managing traffic and parking impacts and ensuring that new developments do not negatively impact the existing road network. The Council will work with the applicant and Staffordshire County Council to ensure that the development is designed to minimise traffic generation and that adequate access and parking are provided on-site, thereby preserving highway safety. Policy TK17 specifies access should be from St Martins Road and requires enhancements to the existing pedestrian/ cycleway link from the site to the A53 cycle route. The policy also requires financial contributions to improvements
St Martins currently has a crumbling area by the proposed site and the extra cars associated with these dwellings would only exacerbate the issues here and throughout various estate roads.	
Historic problems with flooding around TK17	
Many houses in Talke and Talke Pits are built on the top of pits and therefore many houses along High Street have tie bars which residents at the time of purchase were informed are necessary to protect against subsidence - what has changed?	
Objection as site is in the Green Belt and brownfield sites in area	
United Utilities - Sewers pass through this site which will need to be taken into consideration. In addition, we have noted a modelled risk of sewer flooding.	
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	
Historic England - consider impacts on nearby listed buildings including Harecastle Farmhouse Grade II.	

	<p>to Talke Signals, recognising the importance of managing traffic flow and safety at this key junction.</p> <ul style="list-style-type: none"> Flooding and Ground Stability: Concerns about historic flooding problems and potential subsidence due to former mining activity in the area have been considered. Policy TK17 addresses flood risk by requiring a Flood Risk Assessment (FRA) and a sequential approach, prioritising development in areas of lowest risk. Any proposed development must demonstrate compliance with Policy SE3 'Flood Risk Management' and the Strategic Flood Risk Assessment (2024), which identify areas at risk of flooding and recommend appropriate mitigation measures. Additionally, Policy SE2 'Land Contamination' requires a Coal Mining Risk Assessment and a land contamination assessment and mitigation strategy to address the potential for ground contamination and subsidence. These requirements aim to ensure that development does not exacerbate existing flood risks or create new hazards related to ground instability. Green Belt and Brownfield Sites: The Council acknowledges the concerns about developing on Green Belt land when brownfield sites may be available in the area. The Local Plan recognises the importance of protecting the Green Belt and prioritising brownfield development where feasible, Policy TK17 requires proposed development to meet the requirements of Policy PSD5 (Green Belt). The Council has determined that the benefits of allocating this site for housing, given the need for housing in the Borough, outweigh the identified harm to the Green Belt, as detailed in the Green Belt Assessment. The Council will continue to review the availability of brownfield sites and will prioritise their redevelopment wherever possible. Social Infrastructure: The Council recognises the concerns raised about the capacity of existing social infrastructure, including schools, GP surgeries, and dentists, to serve new housing. Policy IN1 'Infrastructure' requires financial contributions towards
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	<p>necessary infrastructure improvements to support the adequate provision of services and facilities in the local area. Policy TK17 requires a financial contribution towards improvements to local schools and health facilities. This contribution will be used to support GP surgeries and dentists and to provide additional school capacity.</p> <ul style="list-style-type: none"> • Air Quality: The Council acknowledges concerns about the potential impact of the development on air quality in the area. Policy SE1 'Pollution and Air Quality' sets standards for new development to minimise air pollution and address the cumulative effects of emissions from proposed development alongside other sources of air pollution. The policy also promotes sustainable transport modes, encourages the use of low-emission vehicles, and supports the increased provision of electric vehicle charging infrastructure. A detailed Air Quality Assessment (AQA) may be required as part of any planning application to assess the impacts of the proposed development and propose mitigation measures. Policy TK17 requires that development is designed and built in a way that minimises any adverse impacts on amenity and the environment. • Heritage: Historic England has advised that the Council consider the potential impact of development on nearby listed buildings, including Harecastle Farmhouse (Grade II). Any development on the site will be required to consider the setting of nearby designated heritage assets and any impact on their significance. A Heritage Impact Assessment (HIA) will be required as part of any planning application, in line with Policy SE9 'Historic Environment', and a programme of archaeological recording to investigate the nature and significance of any archaeological remains that survive on the site will be required. The Council will work with applicants to ensure that any proposed development is
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	<p>sensitive to the setting of any nearby heritage assets and does not harm their character or significance.</p> <p>The Council believes the allocation of TK17 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report ED029.</p>
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124. FDLP TK27: Land off Coppice Road

Summary of Main Issues Raised	How the main issues have been taken into account
Objection as site is in the Green Belt	<p>The Council has carefully considered the feedback received on the proposed allocation TK27: Land off Coppice Road during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to KS18 in the Regulation 19 Local Plan. The council has published a site selection report alongside the Final Draft Local Plan ED029. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Green Belt, Alternative Sites, and Village Character: The Council acknowledges the objections to developing TK27 due to its Green Belt designation and the concerns that the scale of development in Talke is disproportionate to the size of the village and will harm its rural character. The Council also recognises the suggestions that brownfield sites, such as the car park at the bottom of Swan Bank or land on Thomas Street, should be prioritised over greenfield development. Policy PSD5 'Green Belt and Safeguarded Land' sets out the criteria for Green Belt alterations and prioritises the redevelopment of brownfield land. The Council has considered a range of alternative sites as part of the site selection process. The Council has determined that the benefits of allocating the site for development, including its contribution to meeting local housing need, outweigh potential harm to the Green Belt, due in part to its proximity to the village. TK27 includes requirements for a landscape led design that responds positively to the site's context and minimises any adverse visual impacts. Policy TK27 also requires that existing hedgerows and
Thomas street has a brownfield site which should be prioritised over any greenfield	
There is a brownfield site (car park) at the bottom of Swan Bank that should be prioritised over any greenfield	
Highways department halted planning permission for 3 new dwelling on Merelake Road due to increased traffic – this proposal is for 90 dwellings.	
Junction at Coppice Road, Swan Bank and Rockhouse Lane is prone to multiple accidents and the development may create more of a hazard with additional estimated 180 cars.	
The extra traffic on Coppice Road will delay the bus route further	
The junction also floods regularly as well as Merelake Road	
Old mine workings in the area some of which are on TK27 from Bunkershill Colliery	
Lack of amenities in surrounding area	
When there are issues on the M6 and A500, drivers use Coppice Road as a shortcut which often leads to standstill traffic. This development will exacerbate this issue for residents.	
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	

	<p>trees be retained and enhanced wherever possible, the provision of adequate open space, protection of key natural assets and features such as trees and watercourses, the provision of SUDS, the adoption of a landscape-led approach, and ecological enhancements will further mitigate the development's impact on the landscape. This reflects the Council's commitment to protecting the Green Belt and the character of the surrounding area while also meeting the Borough's housing needs.</p> <ul style="list-style-type: none"> • Traffic and Highway Safety: The Council acknowledges the significant concerns raised about the impact of the development on traffic volumes, road safety, and parking in the area. Policy TK27 requires a Transport Assessment (TA) to be submitted with any planning application which must demonstrate how the proposed development will address traffic and parking impacts and ensure that the development will not have a severe impact on traffic levels or road safety, considering the existing capacity issues and safety concerns at the junction of Coppice Road, Swan Bank, and Rockhouse Lane, as well as the potential for increased traffic on Coppice Road to disrupt bus services. The TA should also address the concerns about drivers using Coppice Road as a shortcut when there are issues on the M6 and A500 and propose mitigation measures to address these concerns. Policy IN2 'Transport and Accessibility' and Policy IN3 'Access and Parking' provide further guidance on managing transportation and parking impacts. The Council will work with the applicant and Staffordshire County Council to ensure that any proposed development is designed to minimise traffic generation and that adequate access and parking are provided on-site, thereby preserving highway safety. Off-site highway improvements, including improvements to the junction, may be required to mitigate the impact of the development on the road network, in addition to contributions to improvements to Talke Signals to accommodate strategic network effects.
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	<ul style="list-style-type: none"> Flood Risk, Mine Workings, and Environmental Impacts: Concerns about flooding at the junction of Coppice Road and Merelake Road, as well as the presence of old mine workings in the area have been considered. Policy TK27 requires a Flood Risk Assessment (FRA) and the adoption of a sequential approach, prioritising development in areas of lowest risk. Any proposed development must demonstrate compliance with Policy SE3 'Flood Risk Management' and the Strategic Flood Risk Assessment (2024), which identify areas at risk of flooding and recommend appropriate mitigation measures. Additionally, Policy SE2 'Land Contamination' requires a Coal Mining Risk Assessment and a land contamination assessment and mitigation strategy to address the potential for ground contamination and subsidence. These requirements aim to ensure that development does not exacerbate existing flood risks or create new hazards related to ground instability. Development proposals for the site must also be informed by the Air Quality Strategy set out in policy SE1 'Pollution and Air Quality', demonstrating how any impacts arising from construction and the increased number of vehicles using the local road network are to be mitigated and controlled. Infrastructure and Services: The Council acknowledges the concerns raised about the lack of amenities and the limited capacity of existing infrastructure and services in Talke to accommodate the increased demand from new housing. The Infrastructure Delivery Plan (IDP) identifies the infrastructure needed to support new development and sets out a collaborative approach to delivery. Policy TK27, in accordance with Policy IN1 'Infrastructure', requires financial contributions towards improvements to local schools and health facilities. This recognises that existing services are already under pressure and aims to ensure that adequate provision is made for new residents. The Council will work collaboratively with Staffordshire County Council, developers, service providers, and other
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	<p>stakeholders to ensure that sufficient capacity is provided to meet the needs of both new and existing residents.</p> <p>The Council believes the allocation of TK27 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report ED029.</p>
Historic England - Consider impact on Talke Conservation Area, Church of St Martin Grade II and other nearby heritage assets.	

125. FDLP TK6: Site at Coalpit Hill, Talke

Summary of Main Issues Raised	How the main issues have been taken into account
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	<p>The Council has carefully considered the feedback received on the proposed allocation TK6: Site at Coalpit Hill, Talke during the Regulation 18 consultation. This feedback, along with further technical assessments, has informed the final approach to TK6 in the Regulation 19 Local Plan.</p> <p>The council has published a site selection report ED029 alongside the Final Draft Local Plan. This has considered the suitability, availability, and deliverability of the site. The site policy refers to satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements). Policy SA1 considers a host of technical requirements on the site, linked to the policy criteria included in the Local Plan.</p> <p>Specific Policy Responses to Consultation Feedback:</p> <ul style="list-style-type: none"> Green Belt, Development Scale, and Village Character: The Council acknowledges the objections to the allocation of TK6 due to its Green Belt designation and the concerns that the scale of development in Talke is disproportionate to the size of the village and will harm its rural character, undermining the aims and intentions of Policy SO-VI. Policy PSD5 'Green Belt' sets out the criteria for Green Belt alterations. The Council has considered these concerns as part of the site selection process, balancing the need for housing in the Borough with the need to protect the Green Belt and the character of the surrounding area. The Council has determined that the benefits of allocating the site for residential development, including its contribution to meeting local housing need and its relatively small scale (10 dwellings), outweigh the harm to the Green Belt. The site is also appropriately located adjacent to the settlement boundary of Talke, facilitating a logical extension to the village whilst minimising its impact on the wider rural landscape character. Policy TK6 includes requirements for a landscape-led design that
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
United Utilities - Sewers pass through this site which will need to be taken into consideration.	
A public sewer passes through this site, which will need to be taken into consideration	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	
Sport England - Site identified as a former school playing field site in SHELAA. Site noted contained within the Council's Playing Pitch Strategy.	
Historic England - consider impact on Talke Conservation Area, Church of St Martin Grade II and other nearby heritage assets.	

	<p>responds positively to the site's context and minimises any adverse visual impacts. This reflects the Council's commitment to protecting the Green Belt and the character of the surrounding area while also meeting the Borough's housing needs.</p> <ul style="list-style-type: none"> • Air Quality: The Council acknowledges the concerns about the potential impact of the development on air quality in the area. Policy SE1 'Pollution and Air Quality' sets standards for new development to minimise air pollution and address the cumulative effects of emissions from proposed development alongside other sources of air pollution. The policy also promotes sustainable transport modes, encourages the use of low-emission vehicles, and supports the increased provision of electric vehicle charging infrastructure. A detailed Air Quality Assessment (AQA) may be required as part of any planning application to assess the impacts of the proposed development and propose mitigation measures. • Infrastructure and Services: The Council acknowledges the concerns raised about the capacity of existing infrastructure and services in Talke to accommodate the increased demand from new housing. The Infrastructure Delivery Plan (IDP) identifies the infrastructure needed to support new development and sets out a collaborative approach to delivery. Policy TK6, in accordance with Policy IN1 'Infrastructure', requires financial contributions towards improvements to local schools and health facilities, recognising that existing services are already under pressure and aiming to ensure that adequate provision is made for new residents. The Council will work collaboratively with Staffordshire County Council, developers, service providers, and other stakeholders to ensure that sufficient capacity is provided to meet the needs of both new and existing residents. The policy also requires financial contributions to improvements to Talke Signals, recognising the importance of managing traffic flow and safety at this key junction.
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	<ul style="list-style-type: none"> • Sewers and Flood Risk: The Council and United Utilities (UU) acknowledge that sewers pass through the site and that there is a modelled risk of sewer flooding. Policy SE3 'Flood Risk Management' requires development proposals to address all sources of flooding, including sewer flooding, and any planning application for TK6 will need to demonstrate how it will manage these risks. A Flood Risk Assessment (FRA) and a sequential approach to development, prioritising development in areas of lowest risk, are required by TK6 . Further flood risk assessment or modelling may be required at the application stage. The Council will work with the applicant and UU to ensure that the development is designed to minimise flood risk and that it does not exacerbate existing flooding issues. • Playing Pitch Provision and Open Space: Sport England notes that the site was identified as a former school playing field in the SHELAA and is referenced in the Council's Playing Pitch Strategy. The sites history as a playing field and its contribution to local recreational opportunities will be carefully considered as part of any planning application. Policy SE6 'Open Space, Sports and Leisure Provision' emphasises the importance of providing and protecting open space, sports, and leisure facilities. Any development proposal for TK6 will need to demonstrate compliance with Policy SE6, and any planning application will need to include proposals for the provision, enhancement, and maintenance of open space, considering the site's former recreational use. This may include the provision of new playing pitches, multi-use games areas (MUGAs), or improvements to existing facilities in the Talke area, alongside associated green infrastructure considerations, and the potential for use of off-site contributions to fund improvements and enhancement to existing facilities and spaces. • Heritage and Character: Historic England has advised that the Council consider the potential impact of development on nearby
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	<p>heritage assets, including Talke Conservation Area and the Church of St Martin (Grade II). Any development on the site will be required to consider the setting of nearby designated heritage assets and any impact on their significance. Policy TK6 requires a Heritage Impact Assessment (HIA) as part of any planning application, in line with Policy SE9 'Historic Environment', and a programme of archaeological recording to investigate the nature of and significance of any archaeological remains that survive on the site is also a requirement. The Council will work with the applicant to ensure that the development is sensitive to the setting of any nearby heritage assets and does not harm their character or significance.</p> <p>The Council believes the allocation of TK6 for development strikes a balance between the need for housing and local concerns, as reflected in the site-specific policy in the Regulation 19 Local Plan. The site was deemed suitable for development based on the assessment presented in the Site Selection Report ED029.</p>
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