



Newcastle-Under-Lyme Local Plan 2020-2040



Final Draft Local Plan Regulation 22
Statement of Consultation Part 2
Regulation 19/20 Summary

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1. Introduction

- 1.1. Newcastle-under-Lyme Borough Council consulted on the First Draft Local Plan 2020-2040 from 12 August to October 7, 2024. This followed a Regulation 18 consultation stage which included consultation on Issues and Strategic Options in 2021/22 and a First Draft Local Plan published in 2023 for consultation. Information on the Regulation 18 consultation stages are provided in a separate published report.
- 1.2. This consultation report sets out in respect of the Final Draft Local Plan:
- The stakeholders invited to take part in the consultation.
 - The consultation and publicity methods used.
 - The material that was subject to consultation
 - A summary of the issues received.
 - A response from the Council on the main issues received.
- 1.3. The Council is required to consult with stakeholders at different stages of developing a Local Plan; this stage, which is under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Council to notify stakeholders that is preparing a plan and invite them to make representations on whether the Local Plan is 'Legally Compliant', passes the tests of 'Soundness' and is 'Compliant with the Duty to Co-operate'.
- 1.4. 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 in undertaking the consultation on the Final Draft Local Plan.

2. Plan production timeline

- 2.1. The Council has actively engaged with the Borough's key stakeholders and local communities in the production of the Final Draft Local Plan. Table 1 below identifies the relevant stages and timescales involved.

Table 1: Plan Production Timeline

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 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 Dedicated brownfield call for sites from the 8 November 2022
First Draft Local Plan Consultation	The First Draft Local Plan set out a preferred option for growth plan with preferred site allocations and draft policies.	19 June 2023 – 14 August 2023
Final Draft Local Plan	The Final Draft Local Plan set out final site allocations and policies to be submitted for examination by the Planning Inspectorate.	12 August 2024 – 7 October 2024

3. Summary of process and main issues

3.1. The Council consulted on the following documents: -

- Final Draft Local Plan
- Interim Sustainability Appraisal (incorporating Equality Impact Assessment)
- Interim Habitats Regulations Assessment

3.2. Local Plan evidence documents were also published on the website, alongside several explainer videos and supporting documents, such as frequently asked questions. The website made clear, alongside other relevant notifications and guidance notes that representations could be made in writing to the Council offices, online via the consultation portal or via e-mail. Guidance notes were published as to how to submit comments online, via the consultation portal.

3.3. Copies of the consultation documents were made available on the Council's website and in hard copy form in Council offices, libraries and customer service centres located across the Borough. In line with the Council's Statement of Community Involvement, site notices were put up in relation to areas of land proposed for allocation in the Final Draft Local Plan. A press release was issued in relation to the consultation on the Final Draft Local Plan.

3.4. The Council maintains a database of stakeholders who have responded to the Local Plan previously or have asked to be notified about the Local Plan. E-mails and / or letters were sent out to notify consultees on the database about the consultation. E-mail notifications were also sent to Borough and relevant County Council Councillors, all Town and Parish

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

3.5. The Local Plan featured in an item on Radio Stoke on 29th August 2024 promoting the Plan consultation and featured in 13 social media posts from the Council.

3.6. A total of 1,410 individual comments were received from 429 respondents during the Regulation 19 consultation period. Furthermore, a total of 2 comments from 2 respondents were made to the Habitats Regulations Assessment and 5 comments from 5 respondents were made to the Sustainability Appraisal.

3.7. The majority of representations received to the Final Draft Local Plan were made via email, followed respectively by letter and online consultation portal (web). Figure 1 below shows the % breakdown by method.

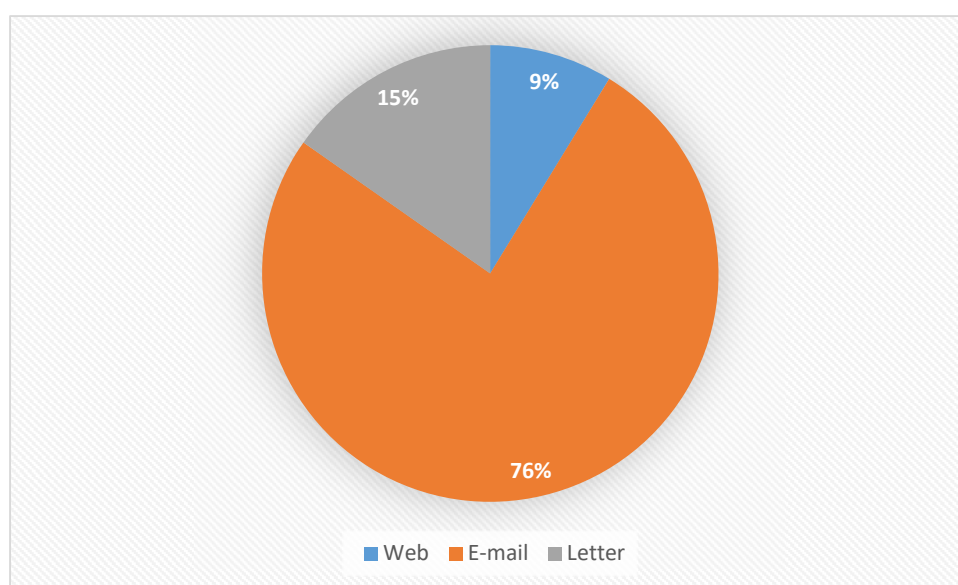


Figure 1: Final Draft Local Plan Responses - by Submission Type

3.8. Table 2 below presents a breakdown of comments made to individual parts of the Final Draft Local Plan consultation document.

Table 2: Comments broken down by consultation point.

Section	Number of Comments
Foreword	6
Contents and List of Policies	0
Consultation	109
Introduction	10
Context	3
Strategic Objectives for the Borough (Chapter Heading)	2
Vision for the Borough	4

Strategic Objectives for the Borough	12
Local Plan Key Diagram	1
Planning for Sustainable Development	1
Policy PSD 1: Overall Development Strategy	45
Policy PSD 2: Settlement Hierarchy	22
Policy PSD 3: Distribution of Development	50
Policy PSD 4: Development Boundaries and the Open Countryside	26
Policy PSD 5: Green Belt	35
Policy PSD 6: Health and Wellbeing	13
Policy PSD 7: Design	13
Climate and Renewable Energy	0
Policy CRE 1: Climate Change	21
Policy CRE 2: Renewable Energy	13
Housing	1
Policy HOU 1: Affordable Housing	23
Policy HOU 2: Housing Mix and Density	14
Policy HOU 3: Housing Standards	10
Policy HOU 4: Gypsy, Travellers and Travelling Showpeople	7
Policy HOU 5: Specialist Needs Housing	5
Policy HOU 6: Self Build and Custom Dwellings	6
Policy HOU 7: Homes in Multiple Occupation	0
Policy HOU 8: Rural and First Home Exception Sites	5
Policy HOU 9: Community Led Exception Sites	2
Policy HOU 10: Extensions, Alterations and Relationships between Dwellings	0
Policy HOU 11: Tandem or Backland Development	0
Employment	4
Policy EMP 1: Employment	7
Policy EMP 2: Existing Employment Sites	4
Policy EMP 3: Tourism	2
Retail	0
Policy RET 1: Retail	6
Policy RET 2: Shop Fronts, Advertisements, New Signage	1
Policy RET 3: Restaurants, Cafes, Pubs and Hot Food Takeaways	1
Policy RET 4: NUL Town Centre	2
Policy RET Kidsgrove Town Centre	4
Infrastructure and Transport	1
Policy IN 1: Infrastructure	23
Policy IN 2: Transport and Accessibility	8
Policy IN 3: Access and Parking	2
Policy IN 4: Cycleways, Bridleways and Public Rights of Way	6
Policy IN 5: Provision of Community Facilities	2
Policy IN 6: Telecommunications of Development	1

Policy IN 7: Utilities	3
Sustainable Environment	1
Policy SE 1: Pollution and Air Quality	7
Policy SE 2: Land Contamination	2
Policy SE 3: Flood Risk Management	4
Policy SE 4: Sustainable Drainage Systems	7
Policy SE 5: Water Resources and Water Quality	4
Policy SE 6: Open Space, Sports, and Leisure Provision	12
Policy SE 7: Biodiversity Net Gain	7
Policy SE 8: Biodiversity and Geodiversity	5
Policy SE 9: Historic Environment	8
Policy SE 10: Landscape	3
Policy SE 11: Trees, Hedgerows and Woodland	1
Policy SE 12: Amenity	2
Policy SE 13: Soil and Agricultural Land	1
Policy SE 14: Green and Blue Infrastructure	5
Rural Matters	0
Policy RUR 1: Rural Economy	1
Policy RUR 2: Workers Dwellings	0
Policy RUR 3: Extensions and Alterations to Buildings Outside of Settlement Boundaries	1
Policy RUR 4: Replacement Buildings Outside of Settlement Boundaries	2
Policy RUR 5: Reuse of Rural Buildings for Residential Uses	1
Site Allocations	20
Policy SA 1: General Requirements	11
Audley	7
Policy AB2 Land at J16 of the M6	162
Policy AB12 Land East of Diglake Street	93
Policy AB15 Land North of Vernon Avenue	53
Policy AB33 Land Off Nantwich Road / Park Lane, Audley	59
Bradwell	0
Policy BW1 Chatterley Valley, Lowlands Road	2
Crackley and Red Street	0
Policy CT1 Land at Red Street and High Carr Farm	104
Cross Heath	0
Policy CH13 Castletown Grange	1
Policy CH14 Maryhill Day Centre	0
Policy CT20 Rowhurst Close	1
Keele	2
Policy KL13 Keele Science Park, Phase 3	10
Policy KL15 Land South of A525 Keele	9
Kidsgrove and Ravenscliffe	3
Policy KG6 William Road	0

Site G&T 11 Land at Hardings Wood Road, Kidsgrove	2
Knutton	0
Policy KS3 Land at Blackbank Road, Knutton	4
Policy KS11 Knutton Community Centre, High Street	1
Policy KS17 Knutton Recreation Centre, Knutton Lane	3
Policy KS18 Land North of Lower Milehouse Lane	2
Policy KS19 Land at Knutton Lane	1
Loggerheads	0
Policy LW53 Land at Corner of Muckleston Wood Lane	29
Madeley and Betley	2
Policy MD29 Land North of Bar Hill	11
Newchapel and Mow Cop	0
Policy NC13 Land West of Bullockhouse Road, Harriseahead	11
Silverdale	1
Policy SP2 Cheddar Drive	4
Policy SP11 Lyme Park	47
Policy SP22 Former Playground off Ash Grove	6
Policy SP23 Land at Cemetery Road / Park Road	22
Site G&T 8 Land West of Silverdale Business Park	14
Talke and Butt Lane	1
Policy BL8 Land adjacent to roundabout at West Avenue, Kidsgrove	1
Policy BL18 Land at Clough Hall	15
Policy BL32 Land at Congleton Road	1
Policy TK6 Site at Coalpit Hill	4
Policy TK10 Land at Crown Bank	9
Policy TK17 Land off St Martins Road	6
Policy TK27 Land off Coppice Road	6
Thistleberry	0
Policy TB6 Former Pool Dam Pub Site	2
Policy TB19 Land South of Newcastle Golf Club	11
Policy TB23 Land West of Galingale View	5
Town	0
Policy TC7 Ryecroft	4
Policy TC19 Hassell Street Car Park	0
Policy TC20 King Street Car Park	1
Policy TC22 Marsh Parade, Newcastle (former Zanzibar Night Club)	15
Policy TC40 Car Park, Blackfriars Road	1
Policy TC45 York Place	1
Policy TC50 Land at Cherry Orchard Car Park	1
Policy TC52 Goose Street Car Park	1
Policy TC71 Midway Car Park	1
Glossary	0
Appendix 1 Monitoring Framework	1

Appendix 2 Saved Policies	0
Appendix 3 Parking Standards	1
Appendix 4 Commitments since 31 March 2023	0
Appendix 5 Design Code for Historic Farmsteads	1
Appendix 6 Indicative Housing Trajectory	2
Appendix 7 Final Draft Local Plan Site Allocation Maps	10
Total:	1410

4. Consultation events

- 4.1. The Council held a total of 10 consultation events where officers were available to answer questions about the consultation and distribute consultation forms. Table 3 below lists the respective consultation events and the number of attendees for each event.

Table 3: First Draft Local Plan Consultation Events

Event	Date	Number of attendees who completed a 'sign in' sheet
Newcastle-under-Lyme Library (by appointment only)	12 August 2024	0
Bradwell (Bradwell Lodge Community Centre)	14 August 2024	14
Loggerheads (Loggerheads Fire Station)	15 August 2024	49
Kidsgrove (Kidsgrove Town Hall)	20 August 2024	23
Madeley (Madeley Centre)	29 August 2024	8
Crackley & Red Street (Red Street Community Centre)	4 September 2024	14
Audley (Audley Methodist Church)	12 September 2024	93
Silverdale (Methodist Church)	16 September 2024	46
Keele (Sneyd Arms)	19 September 2024	36
Guildhall (NUL Town Centre)	24 September 2024	9

- 4.2. Most of the events were 'drop in' type sessions and held for two hours between 5pm and 7pm. The exception was the event at Newcastle-under-Lyme Library on 12 August where an appointment could be made to speak with a planning officer between 10am and 6pm.
- 4.3. Copies of the Draft Local Plan, Policies Booklet, Sustainability Appraisal, Habitats Regulation Assessment, leaflets, posters, FAQs, maps, and representation response forms were available at all events.
- 4.4. Copies of the Final Draft Local Plan in large print and braille were also made available upon request.

Annex 1: Final Draft Local Plan

1. Foreword

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Objection to site AB2 due to its rural location and impacts upon local traffic.	Response set out in pro forma AB2	Response set out in pro forma AB2	NULLP207 NULLP1157	A Nelson Cllr R Lewis.
There are factual inaccuracies in the Local Plan	It is not clear what factual inaccuracies are being referred to in this consultation response.	No change required.	NULLP354	S Bland
Consultation portal has been designed to deter those wishing to comment on the Local Plan.	The consultation portal is designed to facilitate consultation responses to Local Plan documents. The Council published a 'how to' guide to making consultation responses through the consultation portal. Alongside this, responses could be sent to the council via e-mail and in written form by post. Consultation was undertaken in accordance with the Councils Statement of Community Involvement.	No change required.	NULLP354	S Bland
Whilst satisfied with the proposed housing development plan. I am	The Local Plan is supported by a host of	No change required.	NULLP404	Cllr A Fox-Hewitt

<p>disappointed that the Local Plan fails to establish or provide suitable information on the following areas:</p> <ul style="list-style-type: none"> integrated care integrated transport plan green space preservation investment in community facilities roads and infrastructure flood and drainage improvements. education provision 	<p>evidence-based documents. This includes the infrastructure delivery plan which sets out the infrastructure required to support the Local Plan policies and sites. The plan is supported by policies on infrastructure and also the provision of community facilities. As part of the evidence base for the Local Plan, a strategic flood risk assessment [ED013] has been prepared to consider issues such as flood risk and drainage.</p>			
<p>Supporting documents were delayed prior to the full council meeting the 24th of July for council vote compromising the ability to make informed decisions</p>	<p>At the time of making the decision on the 24th July 2024, all evidence base documents were available to make a decision on the Local Plan. A motion on the matter raised was raised and considered at Full Council.</p>	<p>No change required.</p>	<p>NULLP1157 NULLP1294 NULLP557 NULLP558 NULLP1224 NULLP1496</p>	<p>Cllr R Lewis. Talke Action Group E Harrison S Harrison D Barlow Cllr D Jones</p>
<p>A report to cabinet on the 16th of January 2024 recommended approval of the Local Plan to a meeting of Full Council on the 24th of July 2024, over six months before</p>	<p>The item at Cabinet on the 16 January included a consultation report on the First Draft Local Plan. A decision on the</p>	<p>No change required.</p>	<p>NULLP1294</p>	<p>Talke Action Group</p>

that meeting, and indeed before the final draught Local Plan was prepared. This sequence of events cannot but reflect a lack of meaningful consideration of anything arising out of the Reg 18 consultation.	consultation on the Final Draft Local Plan was considered by all Members at Full Council on the 24 July 2024.			
Flawed consultation process, the website states e-mail responses won't be accepted contradicting the council's 24th July 2024 decision to allow them.	The Council website was clear, that all written responses would be considered to the Final Draft Local Plan, including by post, e-mail and via the consultation portal on the Council's website.	No change required	NULLP1157	Cllr R Lewis.
Objections to sites in Talke.	Addressed in proformas for Talke sites	Response set out in relevant pro forma.	NULLP1294	Talke Action Group
The consultation process has been inadequate, many residents were not aware of the plan. The council should have taken additional steps to consult with local residents, particularly those with a specific need.	The consultation process was undertaken in line with the Council's Statement of Community Involvement. Copies of the consultation document was made available in large print / and in Braille, on request.	No change required	NULLP1294	Talke Action Group
The council has failed to comply with its own statement of community involvement and is therefore not legally compliant. It has failed to consider paragraph 1.14 [equal opportunity] which	The Council held a number of consultation events in support of the Local Plan in accessible locations across the Borough.	No change required.	NULLP1294	Talke Action Group

indicates that the council will organise consultation events to maximise involvement such as 3 workshops.				
It is not clear how the council have considered responses to the previous consultation stage at Regulation 18.	The Council has prepared a dedicated and detailed consultation report to show how responses to Regulation 18 consultation have been considered in the development of the Local Plan.	No change required.	NULLP1294	Talke Action Group
Lack of cross-party engagement which is not in line with the requirements of the SCI, paragraph 2.23	The Local Plan has been a standing item agenda on the Council's Economy and Place Scrutiny Committee since 12 December 2022.	No change required	NULLP1294	Talke Action Group
It is unclear whether the Council has met the requirements of the Duty-to-Co-operate.	The Council has published its Duty-to-Co-Operate Statement of Compliance with the Final Draft Local Plan [ED025].	No change required	NULLP816	Home Builders Federation
Counsel opinion from David Manley KC has advised that transitional arrangements set out in the consultation on the Draft National Planning Policy Framework (Proposed reforms to the National Planning Policy Framework and other changes to the planning	Noted	No change required	NULLP723	Knights on behalf of Richborough Estates

system) applied and the Plan can be submitted for examination.				
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2. Contents and List of Policies

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

3. Consultation (not part of the Plan)

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Consultation is not meaningful and fails two Gunning principles: Gunning Principle 2: Sufficient information needs to be supplied for the public to give the consultation 'intelligent consideration'. Gunning Principle 3: There needs to be an adequate time for the consultees to consider the proposal and respond.	Consultation has taken place in line with the Statement of Community Involvement. The Council has published consultation reports, alongside the submission of the Local Plan, for the Regulation 18 and 19 stages of the Local Plan.	No change required.	NULLP340 NULLP474 NULLP380	C Withington Audley Parish Audley Rural Neighbourhood Plan Steering Group
The Issues and Options consultation precluded the option for people to write in by post / e-mail. Issues and Options consultation was extended due to documents missing from the evidence base.	Consultation responses could be submitted, at Issues and Options stage in writing. The consultation at Issues and Options stage was extended due in response to an issue identified within the consultation document.	No change required.	NULLP340 NULLP1496	C Withington Cllr D Jones
Gunning Principle 4: Conscientious consideration must be given to the consultation responses before decisions are made. Earlier consultations responses have not been taken into consideration - and there is no clear audit trail to show how these have been considered and why they have not been considered	The Council has published consultation reports, alongside the submission of the Local Plan, for the Regulation 18 and 19 stages of the Local Plan.	No change required.	NULLP340 NULLP474 NULLP380	C Withington Audley Parish Audley Rural Neighbourhood Plan Steering Group

At Issues and Options stage, unclear where site AB2 was, shown as a star in the consultation with a map of the site only provided following an additional request	The Issues and Options stage of the Local Plan was a strategic document. Additional clarification of the site was provided following a request.	No change required.	NULLP340	C Withington
At Issues and Option Stage, the Officer's report notes the majority objection to the inclusion of AB2. Why was the site then allocated?	The site is proposed for allocation following the implementation of the site selection methodology [ED029] and the outcomes of the strategic employment sites assessment [ED002].	No change required.	NULLP340	C Withington
The online portal is too complicated and long winded for the average person which makes the consultation process undemocratic	A user guide was published alongside the consultation documents on how to use the online portal. Alternative ways of submitting comments, via e-mail and the post was also advertised.	No change required.	NULLP122 NULLP340 NULLP557 NULLP558 NULLP1224 NULLP122 NULLP227 NULLP225 NULLP179 NULLP642 NULLP1114 NULLP1347 NULLP875 NULLP1010 NULLP435	Mr and Mrs Pedley C Withington E Harrison S Harrison D Barlow Mr and Mrs Pedley J Tidyman R Kent D and A Beeston D Mackay K Humphreys I McMillan A Ramsbottom D Fenton R Cooper
Many who submitted responses to the Reg 18 only received an acknowledgement and response if	Consultees who submitted consultation responses at the Reg 18	No change required.	NULLP141 NULLP140 NULLP136	M Thorpe L Dowling D Payne

they included an e-mail address. This discriminates those who do not use e-mail	stage were added to the Council's consultation database and sent notifications (via e-mail / letter) when consultation started on the next stage of the Local Plan.		NULLP129 NULLP227 NULLP225 NULLP233 NULLP222 NULLP231 NULLP223 NULLP226 NULLP230 NULLP229 NULLP235 NULLP224 NULLP238 NULLP232 NULLP228 NULLP593 NULLP1398 NULLP1347 NULLP1355 NULLP1350 NULLP1391 NULLP1455 NULLP1480 NULLP1349 NULLP1342 NULLP1374 NULLP1371 NULLP1375 NULLP1225 NULLP1471 NULLP1393 NULLP1341 NULLP1373 NULLP1397	G Wilding J Tidyman R Kent D Barlow D Hall K Palmer S Heinsohn P Lamb G Bromley D Evans C Hall P Harrison S Smith J Slater S George A Flanagan L Millward I McMillan G Round D Ottley M Marsh D Pegg P Lambert B Ottley S Colclough P Smith A Johnson S Andrzejewski A Hardstaff C Richmond V Hood R Owen P Wright M Halliday
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			NULLP1141	J Hardstaff
			NULLP1343	R Medlock
			NULLP1351	G Walsh
			NULLP1352	P Wright
			NULLP1354	S Edwards
			NULLP1363	D Gill
			NULLP1367	R Davies
			NULLP1395	Mr and Mrs Zwetschnikow
			NULLP1358	P Brennan
			NULLP1362	A Wilkes
			NULLP1378	J&C Williams
			NULLP1382	L Davies
			NULLP1390	T Blairs
			NULLP1368	G Carr
			NULLP1396	M Mountford
			NULLP1447	S Moore
			NULLP1451	S Faint
			NULLP1488	D Paxton-Moore
			NULLP1394	T Sherwood
			NULLP1370	K Mayer
			NULLP1434	J Moore
			NULLP1345	S Medlock
			NULLP1377	T Bostock
			NULLP1376	A Tizley
			NULLP1340	J Harding
			NULLP1481	J Lambert
			NULLP1493	R Lewis
			NULLP1360	A Smith
			NULLP1372	D Williams
			NULLP1389	M Handley
			NULLP1421	C Quinn
			NULLP1437	P Hood
			NULLP1469	D Hackett
			NULLP1473	L Wilkes

			NULLP1442 NULLP1466 NULLP1487 NULLP1497 NULLP1348 NULLP1364 NULLP1380 NULLP1384 NULLP1388 NULLP1464 NULLP1356 NULLP1485 NULLP1506	D Humphries J Hansell S Paxton-Moore G Faint A McMillan D Everall N Davies P Brennan C Findler J Ratcliffe J Brennan D Lench A Wright
Unaware of impact to local area until regulation 18 No consultation event in Red Street at regulation 18	A consultation event was held at Holy Trinity Church, Chesterton at Regulation 18 stage. A consultation event was held at Red Street Community Centre at Regulation 19 stage.	No change required.	NULLP129 NULLP136 NULLP140 NULLP141 NULLP1468 NULLP129 NULLP233 NULLP222 NULLP231 NULLP223 NULLP226 NULLP230 NULLP229 NULLP235 NULLP224 NULLP238 NULLP232 NULLP228 NULLP593 NULLP1398 NULLP1347	G Wilding D Payne L Dowling M Thorpe N Bull Gavin Wilding D Barlow D Hall K Palmer S Heinsohn P Lamb G Bromley D Evans Clair Hall P Harrison S Smith J Slater S George A Flanagan L Millward I McMillan

			NULLP1355 NULLP1350 NULLP1391 NULLP1455 NULLP1480 NULLP1349 NULLP1342 NULLP1374 NULLP1371 NULLP1375 NULLP1225 NULLP1471 NULLP1385 NULLP1457 NULLP1365 NULLP1387 NULLP1475 NULLP1393 NULLP1341 NULLP1373 NULLP1397 NULLP1141 NULLP594 NULLP1343 / 1344 NULLP1351 NULLP1352 NULLP1346 NULLP1354 NULLP1363 NULLP1367 NULLP1395 NULLP1358 NULLP1362 NULLP1378	G Round D Ottley M Marsh D Pegg P Lambert B Ottley S Colclough P Smith A Johnson S Andrzejewski A Hardstaff C Richmond G Baddeley A Pegg J Rigby F Hollingsworth J Hackett V Hood R Owen P Wright M Halliday J Hardstaff R Smith R Medlock G Walsh P Wright S Medlock S Edwards D Gill R Davies Mr and Mrs Zwetschnikow P Brennan A Wilkes J&C Williams
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			NULLP1382	L Davies
			NULLP1390	T Blairs
			NULLP1368	G Carr
			NULLP1396	M Mountford
			NULLP1447	S Moore
			NULLP1451	S Faint
			NULLP1488	D Paxton-Moore
			NULLP1394	T Sherwood
			NULLP1370	K Mayer
			NULLP1434	J Moore
			NULLP1345	S Medlock
			NULLP1377	T Bostock
			NULLP1376	A Tizley
			NULLP1340	J Harding
			NULLP1481	J Lambert
			NULLP1493	R Lewis
			NULLP1360	A Smith
			NULLP1372	D Williams
			NULLP1389	M Handley
			NULLP1421	C Quinn
			NULLP1437	P Hood
			NULLP1469	D Hackett
			NULLP1473	L Wilkes
			NULLP1442	D Humphries
			NULLP1466	J Hansell
			NULLP1487	S Paxton-Moore
			NULLP1497	G Faint
			NULLP1348	A McMillan
			NULLP1364	D Everall
			NULLP1380	N Davies
			NULLP1384	P Brennan
			NULLP1388	C Findler
			NULLP1464	J Ratcliffe
			NULLP1356	J Brennan

			NULLP1506	A Wright
Regulation 18 and 19 site notices were not placed in suitable locations with high footfalls making the consultation inadequately publicised	This consultation report (in the introductory pages) identifies how the consultation was undertaken in line with the Council's Statement of Community Involvement. It is considered that site notices at Regulation 18/19 stages were placed in locations which appropriately advertised the consultation. The site notices were supplemented by other consultation initiatives including direct notification of consultees, social media, and radio consultation events etc	No change required.	NULLP129 NULLP136 NULLP140 NULLP141 NULLP1468 NULLP129 NULLP 233 NULLP222 NULLP231 NULLP223 NULLP226 NULLP230 NULLP229 NULLP235 NULLP224 NULLP238 NULLP232 NULLP238 NULLP593 NULLP1398 NULLP1355 NULLP1350 NULLP1391 NULLP1455 NULLP1480 NULLP1349 NULLP1342 NULLP1374 NULLP1371 NULLP1375 NULLP1225 NULLP1471 NULLP1385	G Wilding D Payne L Dowling M Thorpe N Bull G Wilding D Barlow D Hall K Palmer S Heinsohn P Lamb G Bromley D Evans C Hall P Harrison S Smith J Slater S George A Flanagan L Millward G Round D Ottley M Marsh D Pegg P Lambert B Ottley S Colclough P Smith A Johnson S Andrzejewski A Hardstaff C Richmond G Baddeley

			NULLP1457 NULLP1365 NULLP1387 NULLP1475 NULLP1393 NULLP1341 NULLP1373 NULLP1397 NULLP1141 NULLP594 NULLP1343 / 1344 NULLP1351 NULLP1352 NULLP1346 NULLP1354 NULLP1363 NULLP1367 NULLP1395 NULLP1358 NULLP1362 NULLP1378 NULLP1382 NULLP1390 NULLP1368 NULLP1396 NULLP1447 NULLP1451 NULLP1488 NULLP1394 NULLP1370 NULLP1434 NULLP1345 NULLP1377 NULLP1376	A Pegg J Rigby F Hollingsworth J Hackett V Hood R Owen P Wright M Halliday J Hardstaff R Smith R Medlock G Walsh P Wright S Medlock S Edwards D Gill R Davies Mr and Mrs Zwetschnikow P Brennan A Wilkes J&C Williams L Davies T Blairs G Carr M Mountford S Moore S Faint D Paxton-Moore T Sherwood K Mayer J Moore S Medlock T Bostock A Tizley
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			NULLP1340 NULLP1481 NULLP1493 NULLP1360 NULLP1372 NULLP1389 NULLP1421 NULLP1437 NULLP1469 NULLP1473 NULLP1442 NULLP1466 NULLP1487 NULLP1497 NULLP1348 NULLP1364 NULLP1380 NULLP1384 NULLP1388 NULLP1464 NULLP1356 NULLP1485 NULLP1506	J Harding J Lambert R Lewis A Smith S Williams M Handley C Quinn P Hood D Hackett L Wilkes D Humphries J Hansell S Paxton-Moore G Faint A McMillan D Overall N Davies P Brennan C Findler J Ratcliffe J Brennan D Lench A Wright
The staff at the arranged public events had little or no knowledge of the sites and could not answer questions. No one at the consultation events made notes of comments made by anyone.	The purpose of the consultation events was to appraise attendees of the contents of the Local Plan and how to make comments on the document in the consultation period.	No change required.	NULLP557 NULLP558 NULLP1224	E Harrison S Harrison D Barlow
The Plan is written in such a way that is inaccessible.	The Council produced literature such as	No change required.	NULLP557 NULLP558	E Harrison S Harrison

	frequently asked questions alongside video's published on the website to explain the consultation proposals. Members of staff were available at the various consultation stages to answer questions on the Local Plan.			
Process is unsound from an accessibility perspective. The plan was only available in braille from 25th September, giving little time for anyone who required braille to read through the whole plan. This documentation was only printed in braille following my request 8th August 2024 and no foresight had been made to make a copy generally available at the Newcastle library. No easy read translation available. No interpreter available at Council meetings.	A Braille copy of the Local Plan was made available, following a request, from the 25 th September. The consultation on the Local Plan ended on the 7 th October 2024.	No change required.	NULLP1135	C Stratton
A leaflet drop should have been provided	The Council publicised the consultation in line with the statement of community involvement.	No change required.	NULLP642 NULLP1296	D Mackey Talke Action Group

4. Introduction

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Developments do not address adequately the need for affordable and social housing.	Issue explicitly considered as part of Policy HOU1 Affordable Housing & Policy HOU2 Housing Mix and Density, & the various iterations of the Housing & Economic Needs Assessment (ED001, ED001a & ED001b) that forms part of the evidence base.	No change required.	NULLP18	K Matcham
Capacity of the existing road network has been exceeded without any additional demands from new development being placed upon it.	The Council has prepared a Strategic Transport Assessment [ED011] and Infrastructure Delivery Plan [ED011] which considers the impact of the Local Plan on the local highway network. Issue explicitly considered as part of Policy IN1 Infrastructure and Transport & Policy IN2 Transport	No change required.	NULLP18 NULLP48	K Matcham M Roberts
Coalescence of settlements will take place & their respective individual identity be lost.	The Plan has sought to distribute development and is supported by appropriate evidence, in the form of Green Belt Assessment and other	No change required.	NULLP18	K Matcham

	documents to minimise coalescence of settlements			
The moral & ethical framework should also be considered alongside the legality arguments	The Local Plan will be considered against the tests of soundness set out in the National Planning Policy Framework alongside the need for legal compliance.	No change required.	NULLP18	K Matcham
The Local Plan is commended to the Planning Inspectorate as it addresses aspects including population increase, environmental and employment issues, as well as access to utilities. It is considered to effectively balance the various challenges & identified needs.	Noted	No change required.	NULLP14	G Hutton
Development should consider access to trunk roads and sewage facilities as these are major factors for a mostly rural borough.	The Local Plan is supported by documents including the Strategic Transport Assessment [ED011] and a Water Cycle Study [ED014] which considers the matters raised.	No change required.	NULLP14	G Hutton
General negative sentiment expressed as to the impacts of development on existing residents, & the decision- making process.	Noted, the Plan has been prepared in line with the Council's Statement of Community Involvement.	No change required.	NULLP42	W Hardy
Emergency (fire & police) & social infrastructure (schools, hospitals,	The Local Plan is supported by an infrastructure delivery	No change required.	NULLP48	M Roberts

GP services) are at or beyond capacity	strategy which has considered the impact of allocations, on existing infrastructure, and determined those infrastructure items required to support the delivery of the Local Plan, over the Plan period.			
Owing to the ageing & elderly population, bungalows should be built	Polices HOU2(Housing Mix and Density), HOU3 (Housing Standards) and HOU5 (Specialist Needs Housing) considers the policy approach to older persons accommodation in the Borough.	No change required.	NULLP48	M Roberts
Flood risk, sewage & water drainage is a concern in lower areas of Silverdale	The Local Plan is supported by a level 1 Strategic Flood Risk Assessment [ED013] and Water Cycle Study [ED014]	No change required.	NULLP48	M Roberts
General negative environmental impact disquiet	The Local Plan has been assessed for its environmental, social, and economic impact through the Sustainability Appraisal	No change required.	NULLP48	M Roberts
United Utilities welcomes the meaningful dialogue to date and wishes to confirm no objection to the proposed Local Plan. Reference	Noted	No change required	NULLP801	United Utilities (A Leyssens)

made to the initial site assessments & review of non-site-specific policies, the proposed site allocations, and associated policy wording.				
Legibility of the Local Plan would be improved with clearer identification of the policy areas e.g. varying colours/text boxes.	Noted, this approach will be considered following the examination on the Local Plan	No change required	NULLP585 NULLP811	Historic England (K Taylerson) Home Builders Federation (R Danemann)
Presentational issues specific to the Vision & Strategic Objectives to make distinct exactly which paragraphs the Vision relates i.e. 4.1-4.3 or just 4.1?	As above, the approach of making the vision and strategic objectives more distinct (i.e. included within a text box) will be considered following the examination of the Local Plan	No change required	NULLP811	Home Builders Federation (R Danemann)
It is unclear where the Vision & Strategic Objectives have been derived e.g. Corporate Strategy, Climate Change Plan, Housing Strategy or specifically for the Local Plan. Greater clarity is required to ensure the Local Plan is effective.	The vision for the Local Plan has been derived through consultation stages but has also been informed by the Council's corporate Plans.	No change required	NULLP811	Home Builders Federation (R Danemann)
Challenges of national & local ambitions, requirements, guidance & governance being reconciled. Furthermore, the 20-year Local Plan timeframe is not conducive to dynamic and fast-changing situations being reflected as they emerge, & reflection should be had to predecessors of the emerging Local Plan in understanding	Noted, it is considered that the approach to site allocations in the Plan has been informed by the approach to commitments and completions in the Borough.	No change required.	NULLP312	Thistleberry Residents Association (A Drakakis-Smith)

<p>successes & lessons learnt so that these can be applied in the future. The position re: commitments, completions and the proposed allocations is not clear and could be viewed as being heavily retrospective rather than forward looking.</p>				
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5. Context

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
For the avoidance of doubt, ' & ' should replace ' and ' in the reference to Trent & Mersey Canal detailed in para 3.9.	Noted, this can be considered as an additional minor modification to the Local Plan.	As a minor modification, to replace and with & with referring to the Trent & Mersey Canal	NULLP198	Canal and Rivers Trust (H Smith)
The views of Cheshire East Council & Stoke on Trent City Council under the Duty to Cooperate should have been obtained & fully considered on the Final Draft Local Plan, prior to commencement of the Reg.19 consultation.	The position re Duty-to-Co-operate is set out in the statement of compliance document	No change required.	NULLP432	C Withington
Reference made to comments made at earlier stages of Local Plan production including the Issues & Options in 2022 & the First Draft Local Plan in 2023. Strong objections to the proposals for Audley Parish, particularly the allocation of site AB2 & AB2A. Representation included (as an attached file) an Audley Rural Civil Parish Natural Capital Assessment which presents the current ecological network of the parish and suggests recommendations for the protection and development of the network	Noted. Reference AB2a refers to boundary changes and how the site has been considered through the Green Belt assessment work. The site is referenced as AB2 in the Final Draft Local Plan and its allocation supported by appropriate evidence, including the site selection report.	No change required.	NULLP431	Audley Rural Neighbourhood Plan Steering Group

6. Strategic Objectives for the Borough (Chapter Heading)

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
See comments on Vision and Strategic Objectives below				

7. Vision for the Borough

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Welcome reference to historic environment in the Vision	Noted	No change required.	NULLP499	Historic England (K Taylerson)
National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.	Noted	No change required	NULLP1281	National Highways (D Pyner)
Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation. This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan. Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open	The Council considers that the vision makes appropriate reference to the character and distinctiveness of the Borough. The Council agrees that supplementary wording could be inserted to emphasise the environmental ambition of the Plan	To add text as follows, "We will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas, <u>including the surrounding rural landscape framed by trees and distant hills</u> , with a particular focus on broadening our network of Neighbourhood Plans"	NULLP1315	Natural England (S McLaughlin)

views across the surrounding rural landscape, towards more distant hills often framed by trees” (p 69) Part 3 Site Specific Landscape & Visual Appraisal. “Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms” (p 187) Sustainability Appraisal.				
In principle, Gladman support the Council’s vision and objectives to deliver sustainable new homes and jobs to meet local needs, provide more opportunities for people and to support the growth of businesses, town centres and our university, whilst preserving and enhancing the natural environment, reducing carbon footprint, and respecting and improving the character and distinctiveness of market towns, villages, and other rural areas. This is in general accordance with the sustainability objectives included in paragraph 8 of the NPPF.	Noted	No change required	NULLP746	Gladman Developments Limited

8. Strategic Objectives for the Borough

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Sport England welcomes the principal of objective SO-9 (IX) in supporting physical activity, including sport and recreation. However, it is unclear why the objective continues to state, "maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages, one of the Borough's greatest unique assets to help enhance health and wellbeing". Sport England are unclear if there is a hierarchy for the protection of spaces? Why are green corridor linkages only being sought to be improved? Why does the objective only relate to the urban area as rural open spaces also play an important role in enhancing health and wellbeing.	Noted, to avoid confusion in relation to the intention of the strategic objective, a modification is proposed to remove references to urban areas, so that there is no perception of a hierarchy of open spaces through the Plan.	Amend text as follows: - SO-9(IX).... Maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages....	NULLP211	Sport England (R Bahey)
Strategic Objectives and Policies are supported	Noted	No change required	NULLP265	Betley, Balterley and Wrinehill Parish Council
Welcome a specific objective for the historic environment	Noted	No change required	NULLP501 NULLP482 NULLP383	Historic England Audley Parish Council Audley Rural Neighbourhood Plan Steering Group
No mention of culture, or its potential in helping achieve economic transformation	It is considered that the strategic objectives, as drafted will support economic	No change required	NULLP482 NULLP374 NULLP383	Audley Parish Council S Bland Neighbourhood Plan Steering Group

	transformation in the Borough. Policies in the Local Plan support culture in the Borough			
Supportive of SO-4 (iv) which seeks to mitigate the impact of climate change. The need to respond to the climate emergency should be a 'golden thread' running through the new Local Plan.	Noted	No change required	NULLP782	United Utilities
The DLP includes a list of 12 strategic objectives. Strategic Objectives SO-III, SO-V, SO-V1 are relevant to the delivery of open market and affordable housing and seek to deliver a higher mix of residential uses into existing town centres, provide a mix of housing types across the Borough, and to support the vitality of rural villages by improving affordability and to provide choice in housing types for local people. General support for the above objectives.	Noted	No change required	NULLP734 NULLP864 NULLP723	Knights on behalf of Richborough Knights on behalf of Aspire Housing Knights on behalf of Richborough
Objectives could be strengthened to place greater mention / emphasis on affordable housing delivery	Noted, it is considered the strategic objectives are appropriately framed to cover this matter.	No change required	NULLP864 NULLP1059	Knights on behalf of Aspire Housing West Midlands Housing Association Planning Consortium
Objective SO-5, should refer to a mix of tenures	Noted, it is proposed to make a modification to the Plan to refer to tenures in objective SO-5	Add text to paragraph 4.8, as follows: - "Provide a mix of housing types <u>and tenures</u> which are attractive..."	NULLP1059	West Midlands Housing Association Planning Consortium

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change; however, we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to air quality, water quality and quantity, soils, and landscape. Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.	The Council has proposed several additional strategic objectives in response to the comments raised by Natural England	To add additional Strategic Objectives to the Plan, as follows: - <u>SO14 (XIV) To seek to address the local causes of pollution and the contamination of land.</u> <u>SO15 (XV) To support the implementation of the Nature Recovery Network</u> <u>SO16(XVI) To avoid, where possible, the loss of best and most versatile land and valued soils</u>	NULLP1316	Natural England (S McLaughlin)
The Plan identifies 13 Strategic Objectives for the Borough. Only one of these objectives, SO- 5 (V), specifically relates to housing. This refers to the provision of a mix of housing types and aspirational housing. This objective is supported by Araripe Limited, and is consistent with national policy, namely Paragraphs 60 and 63 of the NPPF	Noted	No change required	NULLP645	Pegasus Group on behalf of Araripe Ltd
No objective refers to providing sufficient homes in the Borough to meet its identified housing need across the plan period, and the role	It is considered that the strategic objectives, as drafted, are appropriately framed.	Noted	NULLP645	Pegasus Group on behalf of Araripe Ltd

<p>this can play in supporting economic growth. Such an objective would align with Section 5 of the NPPF, and the economic and social objectives for development set out within Paragraph 8.</p>				
<p>Objective SO-12 (XII) refers to the fact that the Green Belt will be protected, unless there are exceptional circumstances to justify the release of land from it. It is implied that the Green Belt must be protected in all other scenarios. This is inconsistent with both national policy and draft Policy PSD5, both of which make clear that Green Belt land which has not been released through the plan-making process can still be developed providing that there are very special circumstances to justify this, or the scheme would form an exception to inappropriate development (Paragraphs 152 – 156 of the NPPF). Thus, this objective is currently unsound, and reference should be added that, whilst the Green Belt can be protected as desired by the Council, some development may still be appropriate or permissible if very special circumstances exist.</p>	<p>Noted, the strategic objective is proposed to be amended to reflect the comments made by this representation.</p>	<p>To amend the strategic objective as follows: -</p> <p>SO-12 (XII) Protect the Green Belt <u>through a clear, structured policy approach, except where exceptional circumstances justify strategic Green Belt release to meet strategic needs identified by the Plan</u></p>	<p>NULLP645</p>	<p>Pegasus Group on behalf of Araripe Ltd</p>

9. Local Plan Key Diagram

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Audley is shown as a District Centre and is referred to in the document as such - this is incorrect as Audley is a Local Centre.	Audley is a local centre in the Plan. Church Street is a district centre for retail purposes, in line with the requirements of policy RET1 'Retail'.	No change required	NULLP337	Audley Parish Council

10. Planning for Sustainable Development

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Data used is based on estimates and appears questionable. The post-covid population needs to be verified in the interests of accuracy	The data used in the Housing and Economic Needs Assessment [ED001] is considered robust and proportionate.	No change required	NULLP1273	Thistleberry Residents Association (A Drakakis-Smith)
Affordable housing needs will not be satisfactorily met	The policy approach set out in PSD1 'Overall Development Strategy' is considered to make an appropriate contribution to the delivery of affordable housing in the Borough	No change required	NULLP1273	Thistleberry Residents Association (A Drakakis-Smith)

11. Policy PSD1: Overall Development Strategy

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Plan period should be extended to a minimum of 15 years	Strategic Policies look ahead over a period of 15 years with an end date of 2040, with an anticipated adoption date of 2025. The bulk of the Council's evidence base covers this timeframe. The Council has explored the potential to extend all the evidence base studies further to cover a longer period but consider that this would not be proportionate and would lead to considerable delays in plan production. The Council is clear on its intention to have an up-to-date Local Plan in place at the soonest opportunity to support the intention, in national guidance for a genuinely Plan-led system (para 15 of the National Planning Policy Framework). The National Planning Policy Framework, in paragraph 33, also makes clear that Local Plans should be reviewed to assess whether they need updating at least once every 5 years from adoption of the Plan and this is a legal requirement (Regulation 10a of the Town and Country Planning (Local Planning) (England) Regulations 2012. Through this process, the Council will consider the need for a Plan update, in response to circumstances raised at the time. The implications of the	No change required	NULLP817 NULLP747 NULLP1021	Home Builders Federation Gladman Developments Harworth Group

	revised NPPF (December 2024) may also necessitate an early review of the Local Plan.			
The targets for new housing are unnecessarily high. Volume of housing proposed is out of proportion with the homes needed	The Housing and Economic Needs Assessment has been prepared as a local housing need assessment, conducted using the standard method in line with national planning guidance in the December 2023 version of the NPPF [ED 001]. This study has also informed the Council's consideration of a housing requirement identified in the Plan.	No change required	NULLP251 NULLP357 NULLP1294 NULLP1214	N Ginnis S Bland Talke Action Group C Scott
The Housing and Economic Needs Assessment provides a robust assessment of housing need, having regard to economic considerations.	Noted	No change required	NULLP846	Emery Planning on behalf of the Strategic Land Group
Support for the overall development strategy and the proposed increase to the housing requirement.	Noted	No change required.	NULLP846 NULLP1011 NULLP646 NULLP865 NULLP747 NULLP920 NULLP664 NULLP1000 NULLP998 NULLP964	Emery Planning on behalf of the Strategic Land Group Lichfields on behalf of McCarthy Stone Pegasus Group on behalf of Araripe Ltd Knights on behalf of Aspire. Gladman developments Knights on behalf of Dr Hodgkinson Knights on behalf of Bloor Homes Pegasus Group on behalf of Graham Ward Family Trust

				Pegasus Group on Behalf of Lone Star Land Ltd. Pegasus on behalf of Keepmoat Homes
Given the high level of affordable housing need, it is questioned whether the annual housing requirement should be increased further, and in turn, whether or not some further housing sites should be allocated (or at least safeguarded) across the Borough.	The Council has proposed a housing requirement above the standard method, principally in response to economic considerations in line with paragraph 67 of the December 2023 NPPF. However, this increase above the standard method will also provide for a contribution towards affordable housing in the Borough.	No change required	NULLP865	Knights on behalf of Aspire
Support for housing number expressed as a minimum.	Noted	No change required	NULLP817 NULLP865	Home Builders Federation Knights on behalf of Aspire
Object to the development requirements being expressed as a 'minimum'	The use of minimum is considered appropriate to be reflective of Paragraph 11 (b) of the December 2023 National Planning Policy Framework and that strategic policies, should as a minimum, provide for objectively assessed needs for housing and other uses.	No change required	NULLP341	C Withington
There is a need to consider whether there is a need to re-work the Plan requirement based on an up-to-date mandatory housing target set out in the Proposed Reforms to	Consultation had taken place on the Draft National Planning Policy Framework at the time of consultation on the Regulation 19. The draft consultation documents, include transitional arrangements. The December 2024 version of the NPPF	No change required	NULLP240 NULLP1022 NULLP1227 NULLP960 NULLP704 NULLP1051 NULLP1068	Wardell Armstrong LLP on behalf of S&S Anthony CPRE Staffordshire G Willard Asteer Planning LLP on behalf of Persimmon Homes Limited. Condate on behalf of Johnson

the NPPF and other changes to the planning system (consultation ran from the 30 July to the 24 Sept 2024)	also allows the Council to submit the Local Plan for examination by the 12 March 2025.		NULLP979	Asteer Planning LLP on behalf of Persimmon Homes Ltd West Midland Housing Association Planning Consortium Lichfields on behalf of Madeley Heath Developments Ltd
The draft National Planning Policy Framework identified that the Borough would need to deliver a further 193 dwellings per year. Whilst this higher figure will not prejudice the progress of the emerging Local Plan, it does serve to demonstrate that additional housing will be required.	The Council considers that it has evidenced the need for 400 dwellings in the Local Plan, which is above the standard method figure. The Sustainability Appraisal has considered a higher growth option of 434 dwellings per annum. This has been rejected (in line with Table D.2.3 of the Sustainability Appraisal) as this represents the most optimistic view of forecasts and there is concern over the realism of this option, when balanced against site opportunities and constraints in the Borough	No change required	NULLP950 NULLP934 NULLP865 NULLP955 NULLP670 NULLP928	Knights on behalf of Askew Knights on behalf of Manor View Care Home Knights on behalf of Aspire. Knights on behalf of R Fuller Stantec on behalf of Jones Homes and Renew Land Ltd Knights on behalf of F and J Speed.
The Plan appears to have over allocated in the Plan. Clarification should be provided on this matter and the employment land proposed to be provided through the Plan.	The Council has prepared a clarification note on employment land (ED039). There are qualitative reasons for the allocation of employment land also, as highlighted in paragraph 20 of the Housing and Economic Needs Assessment [ED001].	No change required	NULLP341 NULLP1305	C Withington Audley Community Action Group
A number of competing employment schemes around the proposed site	The strategic employment sites assessment [ED002] has considered the market demand for the allocation of AB2 in the Borough. Paragraph	No change required	NULLP1305	Audley Community Action Group

(AB2) are empty at Audley and Crewe	12.21 sets out the position re the recommendation for the potential allocation of the site.			
Reference to historic environment should be made in this section to ensure the issue is fully considered.	Noted, policy SE9: Historic Environment considers the approach to the historic environment in the Borough. As the Plan is intended to be read as a whole then it is not considered as necessary to refer within this particular policy, at this time.	No change required	NULLP502	Historic England (K Taylerson)
The population / number of households in the borough has decreased	The Housing and Economic Needs Assessment has been prepared as a local housing need assessment, conducted using the standard method in line with national planning guidance [ED 001]. This study has also informed the Council's consideration of a housing requirement identified in the Plan.	No change required	NULLP483 NULLP384 NULLP62 NULLP251 NULLP1214	Audley Parish Council Audley Rural Neighbourhood Plan Steering Group I Rowley N Ginnis C Scott
In terms of housing costs, the borough is one of the lowest priced places to live	The plan proposals are supported by the Housing and Economic Needs Assessment which has been prepared in line with national guidance.	No change required	NULLP483 NULLP384	Audley Parish Council Audley Rural Neighbourhood Plan Steering Group
The key issues in the Borough as a whole concern the range of housing options available and the need to tackle endemic under-occupation by older households.	The plan proposals are supported by the Housing and Economic Needs Assessment which has been prepared in line with national guidance.	No change required	NULLP483 NULLP384	Audley Parish Council Audley Rural Neighbourhood Plan Steering Group
Overall levels of windfall and buffers included in the Local Plan should lead to a	A windfall allowance has been included in the Local Plan, as highlighted in Table 2 (page 14 of the	No change required	NULLP1294	Talke Action Group

reduction in the overall allocated sites proposed in the Local Plan	Local Plan), alongside a buffer to provide for resilient and continuous supply of housing			
How have empty homes been used in the assessments and decisions in relation to the Local Plan.	The Housing and Economic Needs Assessment has followed the requirements of national planning policy in determining local housing need, using the standard method.	No change required	NULLP1294 NULLP615 NULLP1273 NULLP90	Talke Action Group Cross Heath, Wolstanton and May Bank Labour Party Thistleberry Residents Association (A Drakakis-Smith) C Mrozicki
Concerns that house building will not match job growth, and thus raises objection to the sustainability of these developments	The strategic policy in PSD1 (overall development strategy) has been informed by a local housing need assessment, conducted using the standard method. The Council has gone above the standard method, in response to economic and affordable housing considerations in line with paragraph 67 of the National Planning Policy Framework	No change required	NULLP1496	Cllr D Jones
Windfall allowance should be significantly increased	The level of windfall development is appropriately framed in the Plan	No change required	NULLP1024	CPRE Staffordshire
Concern is raised regarding deliverability. Whilst a supply of 8,663 dwellings (including an 8.3% buffer) has been set out within the supporting text, and the HENAFU states (at paragraph 5.7) that an average of 399 dwellings have been provided in the Borough over the past five years, suggesting that 400 dpa is deliverable, this data	It is considered that the certainty provided through the adoption of a Local Plan will support the delivery of sites over the Plan period to meet the housing requirement.	No change required	NULLP646	Pegasus Group on behalf of Araripe Limited

is skewed by two years in which substantially higher levels of student accommodation were provided within the Borough.				
Housing Trajectory - the delivery of dwellings over the plan period is uneven. The housing trajectory should be reviewed.	The housing trajectory is appropriate to support the delivery of sites consistently over the Plan period	No change required	NULLP646	Pegasus Group on behalf of Araripe Limited
Further explanation and clarity are needed on the standard method calculation and how presented in the Local Plan. To Include affordability ratio and position with neighbouring authority etc.	The calculation of the standard method is included in the Housing and Economic Needs Assessment [ED001] and DTC Statement of Compliance. For conciseness, it is not considered necessary to provide this information within the Local Plan.	No change required	NULLP817	Home Builders Federation
Unclear why the Council has chosen a buffer of 8.3% and therefore question if this is effective and justified. Is it a 'policy choice' or the result of residual calculation of housing supply compared to requirement.	The Council has provided for a buffer and windfall allowance as part of the calculation on housing supply (as set out in table 2 of the Local Plan). The approach and amount are considered appropriate to provide for resilience in the overall housing land supply.	No change required	NULLP817	Home Builders Federation
Allowance for windfall sites should be in addition to the buffer added to the housing need figures derived from the Standard	The Council has provided for a buffer and windfall allowance as part of the calculation on housing supply (as set out in table 2 of the Local Plan). The approach and amount are considered	No change required	NULLP817	Home Builders Federation

Method to provide choice and competition in the land market.	appropriate to provide for resilience in the overall housing land supply.			
Publish a schedule of sites that show completions and commitments that form part of the delivery trajectory as an appendix	The Council has provided a housing supply and delivery position statement [ED033] and can provide further information on this point, if required by the Inspector as part of the examination.	No change required	NULLP865	Knights on behalf of Aspire
Flexibility buffer of between 10-20% required	The Council has provided for a buffer and windfall allowance as part of the calculation on housing supply (as set out in Table 2 of the Local Plan). The approach and amount are considered appropriate to provide for resilience in the overall housing land supply.	No change required	NULLP747	Gladman Developments Ltd
The allocation of two strategic sites is a low growth option and should target a high growth scenario	The Local Plan allocation of two strategic employment sites is appropriate and justified.	No change required	NULLP 1021	Harworth Group PLC
Plan should allocate 'Talke Park' (ref: TK30) as a strategic location, increasing housing numbers and employment land.	Site TK30 has been considered through the Strategic Employment Sites Assessment (ED002) and Site Selection work (ED029) alongside other parts of the evidence base with the conclusion that the site is not appropriate for allocation in the Local Plan, at this time.	No change required	NULLP 1021	Harworth Group PLC
The Council will fail to meet its five-year housing land supply upon adoption of the Local Plan. With the requirement for Green Belt	The Council has allocated sites to provide certainty and support the ongoing supply of homes over the Plan period.	No change required	NULLP 1021	Harworth Group PLC

release established to even meet the low growth option, this suggests that it will not be possible to meet the shortage on windfall sites; as such, additional site/s need to be allocated.				
WSP report - The government's consultation on changes to the NPPF includes a standard methodology to housing need. Whilst the transitional arrangements may mean that the Local Plan is not assessed against this higher housing target, this approach would need to be applied once the Local Plan has been adopted to assess their five-year housing land supply and could therefore render policies out of date. The report also highlights the Council's under-appreciation of emerging employment land needs.	The Planning Practice Guidance makes clear that housing requirement figures in adopted strategic housing policies should be used for calculating the 5-year housing land supply figure where the Plan was adopted in the last five years [PPG Paragraph: 005 Reference ID: 68-005-20190722]	No change required	NULLP1021	Harworth Group PLC
Lichfield report - This in-depth analysis by Lichfields considers that, notwithstanding the proposed changes to LHN and the new NPPF, a	It is considered that the Housing and Economic Needs Assessment considers the necessary factors on economic growth and household groups, in line with the NPPF.	No change required	NULLP1051	Asteer Planning LLP on behalf of Persimmon Homes Ltd

requirement of 400 dpa does not fully address the economic growth prospects of NUL; nor does it meet the needs of all household groups as required by the NPPF., including students.				
Role of Chatterley Valley has been downplayed in the Plan	The site at Chatterley Valley has been considered through the Plan in the Council's existing employment land supply figures. Site BW1 (Chatterley Valley, Lowlands Road) supports the ongoing delivery at Chatterley Valley.	No change required.	NULLP1021 NULLP704	Harworth Group PLC Condate Limited on behalf of Johnson
Important that the needs of other groups such as the elderly are provided for.	Noted	No change required.	NULLP615	Cross Heath, Wolstanton and May Bank Branch Labour Party
Five-year supply position is dependent on student accommodation	The Local Plan provides for a number of site allocations to support an ongoing supply of housing, across the Plan period.	No change required.	NULLP704	Condate Limited on behalf of Johnson
Employment land is considered too low	The Council has considered several options, through the development of the Local Plan, informed by the Housing and Economic Needs Assessment. The amount of employment land provided through the Plan is considered appropriate and represents a balanced approach of growth which recognises constraints in the Borough	No change required	NULLP999	Planning Prospects on behalf of Indurent Strategic Land
Part 3 of the policy should be amended to reflect the role of AB2	Part 3 of the policy is appropriately structured to support the delivery of	No change required.	NULLP999	Planning Prospects on behalf of Indurent Strategic Land

	the strategic sites at Junction 16 and Keele University.			
<p>Housing requirement should be increased due to</p> <ul style="list-style-type: none"> • Affordable Housing Need • Job Growth • Potential Unmet Needs • Past and Projected housing delivery rates 	<p>The Housing and Economic Needs Assessment has identified the local housing need, using the standard method. The Council has then considered, using the evidence in the Housing and Economic Needs assessment whether it is necessary to go above the standard method in line with paragraph 67 of the NPPF.</p>		NULLP979	Lichfields on behalf of Madeley Heath Development Limited
<p>The Plan needs to demonstrate how at least 10% of the requirement will be delivered on small sites</p>	<p>It is considered that the Plan can demonstrate that 10% of requirement will be delivered on small sites. Allocations of sites of 1 ha or less is 337 dwellings and then taking account of commitments and completions since 2020 delivers the overall requirement of 10% on small sites</p>	No change required.	NULLP819	Home Builders Federation

12. Policy PSD2 Settlement Hierarchy

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Welcome the reference to Heritage in the final clause of the policy. The policy should refer to the need to protect significance of heritage asses within all four clauses	Noted. The purpose of the settlement hierarchy is to provide a grouping and hierarchy of settlements in the Borough. As the Local Plan should be read as a whole, it is considered that the matter of heritage assets will be considered through the implementation of policy SE9 Historic Environment.	No change required.	NULLP504	Historic England (K Taylerson)
Why was Silverdale not considered as a rural centre? Recognise in the Local Plan documentation the distinct history and geography of Silverdale Ward, the range of services delivered from the village and include references to the size of the transformation required by the largest single allocation of Green Belt release from the Green Belt	For the purposes of the Local Plan, Silverdale is considered to be part of Newcastle-under-Lyme, as a strategic centre.	No change required.	NULLP375	H Adamczuk
Audley is identified as a district centre with Wolstanton, Chesterton and Silverdale. This is an error	Audley is a rural centre in the Local Plan. Church Street in Audley is considered a district centre for retail	No change required.	NULLP485 NULLP385 NULLP358	Audley Parish Council Audley Rural Neighbourhood Plan Steering Group S Bland

	purposes, as set out in Policy RET 1: Retail			
Support for NUL as the Borough's Strategic Centre and a focus for growth	Noted	No change required	NULLP961 NULLP1012	Asteer on behalf of Persimmon Homes Lichfields on behalf of McCarthy Stone
Support for Kidsgrove (incorporating Talke, Talke Pitts, Butt Lane) as the Borough's Urban Centre and a focus for growth	Noted	No change required	NULLP647 NULLP847	Pegasus on behalf of Araripe Limited Emery Planning on behalf of the Strategic Land Group
Support for the Rural Centres defined in the policy and that they are meeting some of the development needs within the Borough	Noted	No change required	NULLP951 NULLP1003 NULLP685 NULLP965 NULLP1002 NULLP982	Knights on behalf of Hamnett Pegasus Group on behalf of Graham Ward Family Trust Stantec on behalf of Jones Homes and Renew Land Pegasus on behalf of Keepmoat Homes Pegasus on behalf of Lone Star Land Ltd. Lichfields on behalf of Madeley Heath Developments Ltd.
Audley should be recognised as a rural centre that will accommodate greater growth than currently proposed	The definition of Audley, as a rural centre, informed by the Rural Topic Paper is considered to be appropriate	No change required	NULLP935	Knights on behalf of Manor View Care Home Limited
Betley should be recognised as a rural centre that can accommodate greater growth than currently proposed	The definition of Betley, as a rural centre, informed by the Rural Topic Paper is considered to be appropriate	No change required	NULLP929	Knights on behalf of F and J Speed
The spatial strategy should recognise that there are clusters of	The focus of growth through the Local Plan is	No change required	NULLP819	Home Builders Federation

villages that provide a range of services that could sustainably support a sustainable level of development.	towards the strategic centre, urban and rural centres. There are policies in the Plan, such as PSD4 Development Boundaries and the Open Countryside, HOU8 Rural and First Home Exception Sites that provide a policy context for centres below the rural centre tier of the settlement hierarchy. Neighbourhood Plans may also wish to provide more detailed consideration of centres below the rural centre tier of the settlement hierarchy.			
Keele University does not reflect the characteristics of the other rural service centres. Keele University should be given a new designation to reflect the services and facilities on Campus.	The location of Keele University with a rural outlook and character, proximity to Keele village and services and facilities (including proximity to heritage assets and its location in the Green Belt) lends itself to the consideration of a rural centre	No change required	NULLP804	Keele University
Keele Village (and University Hub) should be afforded a standalone position in the settlement hierarchy	As above	No change required	NULLP1053	Asteer on behalf of Persimmon Homes

to reflect increased potential housing and economic growth				
Objection to the Rural Topic Paper consideration of public transport and healthcare facilities	The methodology employed in the rural topic paper has been clearly expressed with appropriate data available used to complete the study	No change required	NULLP1180	Loggerheads Parish Council
Supportive of settlement hierarchy	Noted	No change required.	NULLP749 NULLP665	Gladman Developments Ltd Bloor Homes

13. Policy PSD3 Distribution of Development

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings.	The approach to establishing spatial options is set out in the Plan Strategy Housing Topic Paper [ED031, 5.67- 5.107]	No change required	NULLP27 NULLP30 NULLP34 NULLP55 NULLP45 NULLP37 NULLP53 NULLP92 NULLP52 NULLP69 NULLP76 NULLP72 NULLP163 NULLP1170	J Dunlevy S Simkin J Hughes A Wilson E Stevenson T Jones P Allen M Kingston S Allen P Wade J Parr M Mason K Wilson Loggerheads Parish Council
Not clear how the spatial growth options have been considered for Kidsgrove	The approach to establishing spatial options is set out in the Plan Strategy Housing Topic Paper [ED031, 5.67- 5.107]	No change required	NULLP240 NULLP705	Wardell Armstrong on behalf of S&S Anthony Condate Limited on behalf of Johnson
The Policy has downplayed the role of Chatterley Valley as part of the Ceramic Valley Enterprise Zone and the implications for development in Kidsgrove	The majority of the Chatterley Valley site forms part of the Councils employment land supply. Site BW1 which further supports Chatterley Valley is included as a proposed allocation in the Plan	No change required	NULLP240 NULLP705	Wardell Armstrong on behalf of S&S Anthony Condate Limited on behalf of Johnson

The settlement hierarchy notes Keele as a rural centre and omits Silverdale altogether. Thus, the scale of housing allocations contradicts PSD2 and appear opportunistic rather than planned.	Silverdale is considered to form part of Newcastle-under-Lyme as a strategic centre, for the purposes of the Local Plan	No change required	NULLP976	Keele Parish Council
Kidsgrove should be accommodating a higher level of growth given the services, facilities, and presence of a railway station	The approach to spatial distribution is set out in the Plan Strategy employment and housing topic papers	No change required	NULLP848	Emery Planning on Behalf of the Strategic Land Group
The Council should review impacts of development on the infrastructure of rural centres	The Plan is supported by an Infrastructure Delivery Plan	No change required	NULLP616	Cross Heath, Wolstanton and May Bank Labour Party
Loggerheads should accommodate a higher proportion of growth	The approach to spatial distribution is set out in the Plan Strategy employment and housing topic papers	No change required	NULLP749	Gladman Developments Limited
The terminology 'in the order of' should be amended to allow for more certainty over the Plan period	Paragraph 5.12 of the supporting text notes that the figures presented in the policy are not intended as a guide nor target	No change required	NULLP749	Gladman Developments Limited
Support the Council's approach to the distribution of development outlined in this Policy. The policy is justified, with it being informed by the findings of both the	Noted	No change required	NULLP648	Pegasus Group on behalf of Ariape Limited

Sustainability Appraisal and Housing Spatial Strategy Topic Paper				
Support for level of growth directed to Newcastle-under-Lyme as a strategic centre	Noted	No change required	NULLP962	Asteer on behalf of Persimmon Homes Limited
Essential that the statement in the supporting text of the Plan as para 5.12 that the spatial distribution figures are not a ceiling is applied in practice. However, that sentence continues to explain that the spatial distribution is not a target either. We are therefore unclear how this would be monitored and what actions would be taken if development was not coming forward in line with the spatial distribution expected.	The purpose of policy PSD3 is to provide guidance on how the housing requirement is intended to be distributed across the borough	No change required	NULLP820	Home Builders Federation
All housing figures should be presented as a minimum	The purpose of policy PSD3 is to provide guidance on how the housing requirement is intended to be distributed across the borough	No change required	NULLP1005 NULLP808	Pegasus on behalf of the Graham Ward Family Trust Keele University
Why is Madeley and Madeley Heath, along with Betley and Wrinehill considered together	The policy seeks to distribute the housing requirement whilst noting the different character and constraints of centres across the borough	No change required	NULLP1005 NULLP966	Pegasus on behalf of the Graham Ward Family Trust Pegasus Group on behalf of Keepmoat homes
Supports the retained focus on Keele University as an area of growth in the current version of the DLP and the sustainable expansion of Newcastle-under-Lyme.	Noted	No change required	NULLP724 NULLP736	Knights on behalf of Richborough Estates Knights on behalf of Richborough Estates

There is no objection to the policy presumption to directing the most development towards the larger urban centres.	Noted	No change required	NULLP921	Knights on behalf of Dr Hodgkinson
Keele could accommodate a greater level of growth	The approach to the distribution of development is set out in the Plan strategy topic papers for employment/housing	No change required	NULLP957	Knights on behalf of Askew
Audley should be recognised as a rural centre that will accommodate greater growth than currently proposed	The approach to the distribution of development is set out in the Plan strategy topic papers for employment/housing	No change required	NULLP866	Knights on behalf of Aspire
Higher levels of growth could be directed to rural centres due to affordability issues in those areas	The approach to the distribution of development is set out in the Plan strategy topic papers for employment/housing	No change required	NULLP866	Knights on behalf of Aspire
The policy should be updated to take account of the allocation of site TK30 land at Talke Roundabout / A500	The site at TK30 is an omission site in the Plan. Its suitability has been considered through Council evidence and determined that it is not suitable for allocation at this time.	No change required	NULLP1029	WSP on behalf of Harworth Group PLC

The Plan should provide for a higher level of growth at Keele to support the Strategic Economic Development Strategy	The approach to the distribution of development is set out in the Plan strategy topic papers for employment/housing	No change required	NULLP1055	Asteer Planning LLP on behalf of Persimmon Homes
Question the housing supply figures assumed for Keele and the inclusion of student accommodation in the overall figures	It is considered appropriate for student accommodation to be included within the overall figures provided in Keele	No change required	NULLP1055	Asteer Planning LLP on behalf of Persimmon Homes
The Local Plan does not have a robust, consistent, or transparent methodology for determining the level of growth distributed to each settlement	The approach to the distribution of development is set out in the Plan strategy topic papers for employment/housing	No change required	NULLP686	Stantec on behalf of Jones Homes and Renew Land Baldwins Gate
Policy should be amended to allow some growth in Betley	Betley and Wrinehill / Madeley and Madeley Heath are jointly considered in the wording of policy PSD3	No change required	NULLP930	Knights on behalf of F and J Speed.
Flexibility is required in the policy wording	Noted	No change required	NULLP966	Pegasus Group on behalf of Keepmoat Homes
No justification has been provided for the distribution of housing and reasonable alternatives for meeting housing need in Rural Centres have not been properly considered	The approach to the distribution of development is set out in the Plan strategy topic papers	No change required	NULLP984	Lichfields on behalf of Madeley Heath Developments Limited

	for employment/housing			
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14. Policy PSD4 Development Boundaries and the Open Countryside

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Recognition should be given to the role of neighbourhood plans in the policy approach	The supporting text, in paragraph 5.28 refers to neighbourhood plans that can make minor amendments or extensions to settlement boundaries, where justified to do so.	No change required.	NULLP486 NULLP388 NULLP360	Audley Parish Council Audley Rural Neighbourhood Plan Steering Group S Bland
Policy criterion 4 would benefit from reference to heritage assets / historic environment within the sentence	Noted	The criterion is proposed to be amended, as follows: - 4. Development proposals should not harm the character, appearance, historic and environmental quality of the Countryside....	NULLP505	Historic England
The policy approach is considered to be overly restrictive. Use of settlement limits to arbitrarily limit development would not accord with in the positive approach required by National Planning Policy.	Section 3 of the settlement boundary review document [ED007) considers the use of settlement boundaries in the Local Plan	No change required	NULLP750	Gladman Developments
Support for the removal of site TK17 from the Green Belt	Noted	No change required	NULLP649	Pegasus on behalf of Araripe Limited
Land at Stone House Farm, Baldwins Gate should be included in the settlement boundary	The settlement boundary review [ED007) has considered the definition of settlement boundaries around Rural Centres	No change required	NULLP953	Knights on behalf of Askew

Land at 3 Highway Lane, Keele should be included in the Policies Map settlement boundary for Keele	The settlement boundary review [ED007] has considered the definition of settlement boundaries around Rural Centres.	No change required	NULLP958	Knights on behalf of Fuller
Concern that the review of village envelope boundaries that could result in changes to make it easier to build within village envelopes	The policy approach in the Local Plan is clear on circumstances and the types of development that will be supported.	No change required	NULLP617	Cross Heath, Wolstanton and May Bank Branch Labour Party
The government intends to move away from First Homes, and this should be reflected in Policy	The Local Plan reflects the position outlined in the December 2023 National Planning Policy Framework	No change required	NULLP822	Home Builders Federation
Important that settlement boundaries are drawn around existing development sites that have come forward as well as encompassing proposed allocations	Noted.	No change required	NULLP725 NULLP922 NULLP666 NULLP737	Knights on behalf of Richborough Estates Knights on behalf of Dr Hodgkinson Knights on behalf of Bloor Homes Knights on behalf of Richborough Estates
It is noted that with some settlements there are some sites that are enclosed on three sides by a combination of proposed allocations and proposed settlement boundaries. In such scenarios, it is suggested that the settlement boundaries are re-drawn to include such enclosed sites within the settlement boundary as such sites are likely to meet the definition of "Grey Belt" set out in	The Local Plan reflects the position outlined in the December 2023 National Planning Policy Framework. The concept of Grey Belt. This Local Plan is being prepared in line with the transitional arrangements set out in the NPPF.	No change required	NULLP867	Knights on behalf of Aspire

the proposed changes to national policy				
Wood Lane, Miles Green, and Halmer End – are proposed to be “inset” from the Green Belt, but the draft policies map suggests that these settlements will be identified within the inset boundaries as Open Countryside. It is considered that such settlements should be defined with a development boundary within which development would be acceptable in principle	The approach in the settlement boundary review [ED 007] is to consider the definition of settlement boundaries for the higher order centres of the settlement hierarchy – strategic, urban, and rural centres. The approach does not prevent neighbourhood plans from setting settlement boundaries for their communities.	No change required	NULLP867	Knights on behalf of Aspire
Criteria 3h is permissive of the infill of a small gap with one or two dwellings in an otherwise built-up frontage. It is considered that this aspect of the policy is too restrictive	The approach provides certainty in terms of the consideration of an infill development.	No change required	NULLP867	Knights on behalf of Aspire
A further type of allowable development should be added to Part 3 of Policy PSD4 to read, “Development in accordance with the allocations made in this Plan.”	The settlement boundary work has considered proposed allocations in the definition of settlement boundaries	No change required	NULLP1001	Planning Prospects on behalf of Indurent Strategic Land
The settlement boundary should retain that contained in the Loggerheads Neighbourhood Pan. Site LW53 should be removed.	Site LW53 is proposed as an allocation in the Local plan	No change required	NULLP1172	Loggerheads Parish Council
Keele University development boundary should be extended to	The settlement boundary work has	No change required	NULLP809	Keele University

incorporate wider areas of the existing University campus. This approach will support the long-term investment plans and growth strategy and ensure that the policy is positively prepared.	considered existing boundaries and, in the Green Belt, allocations proposed in the Plan. The Council considers that exceptional circumstances extend to Green Belt changes for allocations but not for other Green Belt boundary changes.			
It is positive to see at Part 4(h) that the Council will consider development in the countryside where it “meets a demonstrable local housing need such as affordable housing and / or self-build plots.” This will help to ensure that rural housing needs are met and that rural communities remain sustainable/self-supporting.	Noted	No change required.	NULLP1069	West Midlands Housing Association Planning Consortium.

15. Policy PSD5 Green Belt

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Exceptional circumstances have not been proven	The exceptional circumstances case is set out in the Plan Strategy Housing / Employment Topic Papers [ED031/ED032]	No change required	NULLP330	K Edge
Land should be repurposed within settlement boundaries	Noted, allocations have been made in the Local Plan to repurpose uses within the urban area, where possible	No change required.	NULLP330	K Edge
How has the Plan considered the approach to density standards to avoid Green Belt release?	This approach is set out in the Plan Strategy Housing Topic Paper [ED031, page 37]	No change required	NULLP330	K Edge
The council has now published a Green Belt Assessment Part 4 (July 2024) which specifically assesses Talke Park (TK30), finding that it's development would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town. Whilst it finds that it would represent an incursion into undeveloped countryside, this would be the case for any greenfield site.	TK30 has been considered through the Green Belt Assessment [ED008] as making a moderate contribution to Green Belt purposes. The Site Selection Report has considered the suitability of the site for allocation and determined that the site is not suitable for allocation in the Local Plan at this time.	No change required	NULLP1030	WSP on behalf of Harworth Group
Object to the release of site AB2 from the Green Belt	The site is allocated in the Local Plan and is justified by a host of		NULLP487 NULLP389 NULLP431	Audley Parish Council Audley Rural Neighbourhood Plan Steering Group

	evidence base documents such as the site selection report [ED029]		NULLP361	C Withington S Bland
There has been no cumulative assessment of the impact of site allocations on the Green Belt	The approach to site selection has been informed by the outcomes of the Green Belt Assessment and has considered options for development at different spatial scales	No change required.	NULLP431	C Withington
Insert a new point o. in bullet 2 of PSD5 to list 'Land at Madeley High School' for consistency as the Plan, in policy IN1 allocates land to support the extension of Madeley High School	Noted and agreed.	To insert an additional criterion to 2, C, 'to allocate land at Madley High School'	NULLP1093	Staffordshire County Council
The policy should be explicit that the authority will insist on developers compensating the local community for the loss of Green Belt land	The approach to compensatory improvements relates to environmental quality and accessibility as set out in criterion 6 of the Policy.	No change required	NULLP618	Cross Heath, Wolstanton and May Bank Branch Labour Party
Policy PSD 5 is consistent with national policy, namely Paragraphs 152 to 156 of the NPPF, and is therefore considered sound on this basis. Support for the alteration of the Green Belt boundary at St Martins Road to incorporate site TK17	Noted	No change required	NULLP650	Pegasus Group on behalf of Araripe Limited

The Council should explore the possibility of identifying safeguarded land to enable sites to be quickly identified and allocated when the new Local Plan is subject to review, or should additional land be required during the next plan period should delivery not come forward as quickly as envisaged	The Council's response and reasons for not identifying safeguarded land is set out in Plan Strategy Housing Topic Paper [ED031, section 5.61 – 5.66].		NULLP868 NULLP1056	Knights on behalf of Aspire Housing Aster Planning on behalf of Persimmon Homes Limited
Policy PSD 5 is justified, as are the proposed allocations that follow from it. Exceptional circumstances exist to amend Green Belt boundaries.	Noted	No change required	NULLP726 & NULLP738 NULLP667	Knights on behalf of Richborough Estates Knights on behalf of Bloor Homes
The Green Belt boundary should be reviewed to allocate Land at High Street, Newchapel	Sites have been assessed through the Green Belt Assessment [ED008] and the site selection process which has considered the suitability of sites for allocation in the Local Plan	No change required	NULLP786	Knights on behalf of Seddon Homes
To remove the wider Keele University Campus from the Green Belt and include it within the development boundary	The Council considers that exceptional circumstances extend to Green Belt changes for allocations but not for other Green Belt boundary changes.	No change required	NULLP810	Keele University
Land at New Farm, Cross Lane, Audley should be removed from the Green Belt and allocated for residential purposes	Sites have been assessed through the Green Belt Assessment [ED008] and the site selection process which has considered	No change required	NULLP940	Knights on behalf of Manor View Care Home Ltd

	the suitability of sites for allocation in the Local Plan			
Land at to the west of Newcastle Road, Talke should be removed from the Green Belt for Electric Vehicle Charging Infrastructure and allocated in the Plan for such uses	Sites have been assessed through the Green Belt Assessment [ED008] and the site selection process which has considered the suitability of sites for allocation in the Local Plan	No change required	NULLP713	Knights on behalf of Evolution 500
Land at Betley Court Farm should be removed from the Green Belt and allocated for development	Sites have been assessed through the Green Belt Assessment [ED008] and the site selection process which has considered the suitability of sites for allocation in the Local Plan	No change required	NULLP932	Knights on behalf of F and J Speed
It is noted that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England has some site-specific concerns about the potential impacts of some of the Green Belt sites selected on the natural environment with regards to habitat loss, fragmentation, and justification for the loss of BMV agricultural land	The Council considers that exceptional circumstances exist for Green Belt release. As evidenced in the Plan Strategy topic Papers [ED032 / ED033, respectively). Sites are allocated to meet the development requirements of NUL and not Stoke-on-Trent City Council.	No change required	NULLP1317	Natural England

Site AB75 should be taken out of the Green Belt and allocated for development	Sites have been assessed through the Green Belt Assessment [ED008] and the site selection process which has considered the suitability of sites for allocation in the Local Plan	No change required.	NULLP1230	G Willard
<p>Policy PSD4: Green Belt and the Policies Map fails to meet the tests of soundness for the following reasons:</p> <p>1 It is not positively prepared – it fails to identify sufficient sources of developable residential land that are underpinned by sound evidence.</p> <p>2 It is not justified – the Council has not provided robust evidence to underpin its housing requirement and has not considered reasonable alternatives to meet housing needs on additional sites.</p> <p>3 It is not effective – the proposed Green Belt boundary will not allow the delivery of housing required as evidenced in our response to draft Policy PSD1; and,</p> <p>4 It is not consistent with national policy – it therefore fails to afford with the Framework (paragraphs 15, 20, 60 – 62 inclusive).</p> <p>Land at Madeley Heath (MD12A) should be allocated</p>	Sites have been assessed through the Green Belt Assessment [ED008] and the site selection process which has considered the suitability of sites for allocation in the Local Plan	No change required	NULLP983	Lichfields on behalf of Madeley Heath Developments Limited

A review of the 2017 Green Belt Assessment should be undertaken in order to identify grey belt sites, and lower quality Green Belt sites, with a particular focus on the north of the borough given the unbalanced distribution of housing land supply.	The Plan has been prepared in line with the current version of the NPPF, the December 2023 version which contains no reference to Grey Belt.	No change required	NULLP707	Condote Limited on behalf of Johnson
The proposed country park within SP11 and the SP14 the Cow field should remain incorporated the greenbelt.	Following further assessment, it is considered appropriate for site SP11 to be removed from the Green Belt. Parts of the site are allocated as a Country Park.	No change required	NULLP376	H Adamczuk

16. Policy PSD6 Health and Wellbeing

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
It should be a requirement for the applicant to submit an Active Design Checklist	The policy requires schemes to follow Sport England's Active Design Principles, matters such as the active design checklist can be considered in the implementation of the policy, through, for example, a validation checklist.	No change required	NULLP215	Sport England
Active travel includes equestrians and should be referenced in the policy and any travel plan.	The Local Plan is intended to be read as a whole. Policy IN4 refers to cycleways, bridleways, and public rights of way.	No change required	NULLP271	The British Horse Society
Health Impact Assessments should be used in the scrutiny of development applications, such as to curb the number of town centre shops selling vapes.	The policy requires a core screening health impact assessment to be prepared for major development schemes	No change required	NULLP620	Cllr R. Gorton (Cross Heath, Wolstanton and May Bank Branch Labour Party)
Natural England welcome this policy direction. Further information on joining up Nature Recovery and Green Infrastructure is provided.	The Council acknowledges Natural England's support of this policy and will review the additional information provided by the statutory consultee	No change required.	NULLP1327	Natural England
NHSPS supports the requirement for Health Impact Assessments on major developments.	The Council appreciates NHS Property Services support for Health	No change required.	NULLP885	NHS Property Services

	Impact Assessments on major developments.			
PSD6 should include requirements for the delivery of Lyme Park (SP11) No dwelling in SP11 should be occupied until the boundaries of the associated country park have been set out and its main features provided.	SP11 has its own policy approach in the Local Plan and the allocation is delineated on the Policies Map	No change requires	NULLP1231	G. Willard
PSD6 is not in line with National Policy, it is important for the difference between a Health Impact Assessment screening and a full Health Impact Assessment is explained in the Plan.	The Council acknowledges Home Builders Federation's response. There is further information on the distinction between different Health Impact Assessments in document ED035 Health Impact Assessment in the Council's evidence base.	No change required.	NULLP849	Home Builders Federation
Proposals for delivering specialist housing for older people should be excluded from Health Impact Assessments	It is considered that health impact assessments could support the delivery of specialist housing in the Borough	No change required	NULLP1037	The Planning Bureau (on behalf of McCarthy Stone)
The Staffordshire Public Health and Prevention Team are supportive of this policy	The Council appreciates Staffordshire County Councils ongoing support in producing this policy.	No change required.	NULLP1066	Staffordshire County Council
Development should only adhere to Active Design principles where	The Council acknowledges Jones Homes and Renew Land	No change required.	NULLP688	Stantec (on behalf of Jones Homes and Renew Land Baldwins Gate)

possible as a material consideration.	Baldwins Gate response to the use of Active Design Principles. The policy will maintain the use of Active Design Principles as the Council views this as a tool to incorporate healthy lifestyles into planning.			
Remove the requirement for a Health Impact Assessment	The Council acknowledges this response. Evidence collected from both Newcastle-under-Lyme Borough Council and Staffordshire County Council, available in ED035 Health Impact Assessment gives credence to using HIAs to reduce health inequalities across the Borough.	No change required.	NULLP869 NULLP727	Knights (on behalf of Aspire Housing) Knights (on behalf of Richborough Estates)

17. Policy PSD7 Design

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Wording to Supporting Information 5.46 should conclude “Secured by Design principles and design guides aim to deliver more secure, safer and sustainable communities and developments by reducing the opportunity for crime, anti-social behaviour and the fear of crime including promoting the adoption of appropriate security features and standards”	The policy wording, in criterion 6 refers to secured by design principles which will provide for its consideration through appropriate design supported by the Local Plan.	No change required.	NULLP610	Staffordshire Police
Related Documents should be amended to “Secured by Design, Police Crime Prevention Initiatives Limited”	Noted, this will be amended in the Local Plan	To amend the related document listed as follows: - Secured by Design, Police <u>Police</u> Crime Prevention Initiatives Limited	NULLP610	Staffordshire Police
Wording to Supporting Information 5.45 should be amended to “Developers must 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”	Paragraph 5.45 is considered to be appropriately framed in ‘should’ rather than ‘must’	No change required	NULLP619	Cllr R. Gorton (Cross Heath, Wolstanton and May Bank Branch Labour Party)
The requirement for all major developments to be subject to a Design Review process is likely to be untenable. Moreover, this element of the policy is inconsistent with the supporting text which states, at paragraph 5.47, that a Design	Policy PSD7 Design seeks to emphasise the importance of high quality and functional developments in the Borough, achieved through good design.	No change required	NULLP651	Pegasus Group (on behalf of Araripe)

Review is only required for “large and complex sites”, rather than all forms of major development. This is considered a more appropriate and manageable approach. As such, this aspect of the policy should be amended accordingly, to align with the supporting text, ensuring that the policy will be effective.	The Design Review process is an important part of demonstrating that the scheme achieves high quality design in the borough.			
The term ‘beautiful’ should be removed, given the proposed changes to the NPPF.	The Local Plan has been prepared in the terms of the December 2023 version of the NPPF.	No change required.	NULLP489 NULLP362 NULLP390	Audley Parish Council S. Bland Audley Rural Neighbourhood Plan Steering Group
There is insufficient emphasis on permeability, connectivity, green infrastructure, and quality of the public realm.	Criteria 8 refers to accessibility and connectivity of development.	No change required	NULLP489 NULLP362 NULLP390	Audley Parish Council S. Bland Audley Rural Neighbourhood Plan Steering Group
There is no mention of the National Design Guide 2021 and the ten priorities for design that it identifies.	Policy criterion 1 refers to National Design Guidance.	No change required	NULLP489 NULLP362 NULLP390	Audley Parish Council S. Bland Audley Rural Neighbourhood Plan Steering Group
Building for a Healthy Life should not be undertaken on applications for individual dwellings.	The policy is considered to be appropriately framed.	No change required.	NULLP850	Home Builders Federation
The Local Plan needs to be clear about what ‘meeting the building for a healthy life standard’ would	The related documents refer to the guidance on	No change required.	NULLP850	Home Builders Federation

entail, and what information would be needed to show that a development would achieve it.	Building for a Healthy Life standard.			
An additional 12th criterion should be included as follows: 'At the outset of the design process, development proposals will be required to embrace sustainable water management principles through the application of the surface water hierarchy; making space for high quality sustainable drainage systems (SuDS) through their integration with landscaping and the wider green and blue environment; and the incorporation of water efficiency measures.'	The Plan is intended to be read as a whole. Policy SE4 considers sustainable drainage systems	No change required	NULLP783	United Utilities
The requirement for all proposals of 10 or more dwellings to engage in a design review process appears overly stringent	The Council requires a design review on schemes of proposals of 10 or more dwellings to ensure that quality and consistency in design decisions.	No change required.	NULLP1072	Tetlow King (on behalf of West Midlands Housing Association Planning Consortium)
Building for a Healthy Life standard should be addressed either in Policy PSD6 or Policy PSD7, not both.	Policy PSD7 only refers to Building for a Healthy Life Standard	No change required	NULLP751	Gladman Developments Ltd
Design review panels often frustrate the planning process at the outline planning application stage.	The Council acknowledges this response, however, believes the design review process allows early identification of	No change required	NULLP751	Gladman Developments Ltd

	potential issues which ultimately saves costs in the long run and can lead to better quality proposals.			
Would expect to see reference to heritage within a design policy and recommend the Council incorporate a separate clause to deal with this issue and ensure that new design considers its impact on heritage assets.	Noted	A new clause is intended to be added as follows: - <u>12. Development proposals should respond positively to local character and should conserve and, where possible, enhance heritage assets and their settings</u>	NULLP506	Historic England
The council should apply a degree of subjective assessment on a site-by-site basis taking account of local context, character, and surroundings such that each development is capable of being assessed on its own merits. This should take the form of a Supplementary Planning Document.	Noted. The Council will consider whether a supplementary planning document (or equivalent) is required.	No change required	NULLP689	Stantec (on behalf of Jones Homes and Renew Land Baldwins Gate)
Amend the wording of criteria 4 so that the design review panel process is only required for developments of 50 or more dwellings.	The Council requires a design review on schemes of proposals of 10 or more dwellings to ensure that quality and consistency in design decisions.	No change required	NULLP870	Knights (on behalf of Aspire Housing)

18. Climate and Renewable Energy

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

19. Policy CRE1 Climate Change

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Energy hierarchy should be defined in the Plan	Noted	To include a definition of the energy hierarchy in the Glossary of the Local Plan, as follows: - <u>Energy hierarchy - to reduce levels of carbon dioxide emissions in the built environment. It seeks to reduce energy demand, to supply energy efficiently and use renewable energy.</u>	NULLP851	Home Builders Federation
Criterion 2 - The Council does not need to set local energy efficiency standards in a Local Plan policy because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.	Criterion 2 refers to non-residential developments. The requirement of energy efficiency standards is supported by the Climate Change Adaptation and Mitigation Report [ED024]	No change required	NULLP752	Gladman Developments Ltd
Criterion 3 - policy requirement for the optional water efficiency standard must be justified by credible and robust evidence.	The justification for water standards is set out in the water cycle study [ED014]	No change required	NULLP752 NULLP697	Gladman Developments Ltd Stantec on behalf of Jones Homes and Renew Land Baldwins Gate
Criterion 3 should refer to the optional standard for water with just the reference to building regulations rather than precise requirements.	Noted	The current requirements in the policy reflect document G of the Building regulations, it is proposed to add the words (as updated) to the end of the sentence to reflect changes in requirements over the Plan period.	NULLP785	United Utilities

Criteria 3 – standard should be set to 100l/p/d a day in line with water cycle study	Noted	See above response to United Utilities	NULLP731	Environment Agency
Criteria 2 and 3 should refer to 'must' rather than should	The use of 'should' is considered appropriate as there may be exceptional reasons why adherence to the standards is not possible.	No change required	NULLP785	United Utilities
The Council can set its own targets within the policy, without reference to the Building Regulations. However, these must not exceed the current requirements of the Building Regulations, as a Ministerial Statement dated 13th December 2023 made clear that planning policies including greater standards should generally be rejected at examination. It is considered that these amendments are required for this policy to be found sound.	It is considered that the current requirements are consistent with national policy and guidance on these matters.	No change required	NULLP652	Pegasus on behalf of Araripe Limited
Policy should not repeat building regulations requirements	Noted	No change required	NULLP851 NULLP1062	Home Builders Federation West Midland Housing Association Planning Consortium
Criteria 5 – not clear if the reference to a whole-life cycle carbon assessment is mandatory or not	The requirements are not mandated but are encouraged through policy for good practice	No change required	NULLP871	Knights on behalf of Aspire
Criteria 6 – too prescriptive and not justified.	The justification for the requirements is set out in the Climate Change	No change required	NULLP697	Stantec on behalf of Jones Homes and Renew Land Baldwins Gate Ltd.

	adaptation and mitigation report			
Unsure of the meaning of clause 7	Clause 7 is consistent with the requirements of national planning policy to ensure that schemes are able to respond to the requirements of climate change impacts.	No change required	NULLP490 NULLP363 NULLP391	Audley Parish Council Simon Bland Audley Rural Neighbourhood Plan Group
Clause 8 – heat networks remain uneconomic in terms of installing low-carbon technologies	Clause 8 requires the feasibility of district heat networks to be investigated before considering other sources	No change required	NULLP851	Home Builders Federation
Criteria 11 – should refer to Historic England guidance, published on the 31 July 2024 or its successor	The guidance notes can be considered as a material consideration without necessarily being referred to in the policy.	No change required	NULLP871	Knights on behalf of Aspire
Should include text on walkable neighbourhoods	Criteria 6 (g) refers to promoting opportunities for sustainable travel modes.	No change required	NULLP490 NULLP391	Audley Parish Council Audley Rural Neighbourhood Plan Group
Should be a focus on climate resilience	The policy, when read as a whole, is seeking to support climate change resilience in the Borough	No change required	NULLP490 NULLP391	Audley Parish Council Audley Rural Neighbourhood Plan Group
The policy should refer to the historic environment Strategy to protect existing buildings from demolition and repurpose heritage	Noted, criterion 11 considers the historic environment and setting.	No change required	NULLP507	Historic England

assets would also be beneficial to re-use existing embedded Carbon.				
Support for policy wording	Noted	No change required	NULLP1096 NULLP888	Staffordshire County Council NHS Property Services
Modify as follows: a) oblige developers to consider the district heat network based at Keele before other heat sources were considered; b) cost of maintaining green spaces should be carried by developers.	The current wording in criterion 8 is considered appropriate in supporting the intention of the policy.	No change required	NULLP621	Cross Heath, Wolstanton and May Bank Branch Labour Party
Promotion of electric vehicle charging infrastructure site at Talke, the Local Plan has not met future infrastructure requirements for EV Charging infrastructure	The site at Talke has been considered through the Councils site selection report and discounted in this Local Plan.	No change required	NULLP712	Knights on behalf of Evolution 500
Acknowledge the inclusion of decarbonisation policies	Noted	No change required	NULLP 1286	Highways England
Recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies	Noted, the Local Plan is intended to be read as a whole and therefore the structure of the Plan is considered appropriate with no further changes proposed at this stage	No change required	NULLP1329	Natural England

20. Policy CRE2 Renewable Energy

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Criterion 1 – a figure higher than 10% should be used in this policy	It is considered that the 10% approach is justified in the climate change adaptation and mitigation report [ED024], when balanced against other considerations including viability and feasibility.	No change required	NULLP622	Cross Heath, Wolstanton and May Bank Branch Labour Party
Criterion 1 – this requirement should not be included as considered through building regulations / future homes standard	The requirements are consistent with the Council's evidence in the climate change adaptation and mitigation report [ED024]	No change required	NULLP853 NULLP873	Home Builders Federation Knights on behalf of Aspire
Criterion 1 – 10% figure is not justified and has it been viability tested?	The requirements are consistent with the Council's evidence in the climate change adaptation and mitigation report [ED024]	No change required	NULLP1063	West Midlands Housing Planning Consortium
Criterion 3 – recommend that the clause is amended to 'harm'	Noted	Policy is proposed to be amended to substitute the word impact for harm	NULLP508	Historic England
Criterion 7 – should recognise that renewable energy proposals have a specific locational requirement. This element is not consistent with the NPPF	Criteria 7 is consistent with the approach of the National Planning Policy Framework (December 2023) and planning	No change required	NULLP814	Keele University

	practice guidance at the time of preparing the Local Plan.			
Criterion 8 – reference should be made to protecting the significance of heritage assets, and their settings in this clause	Noted	Additional clause added, as follows: - <u>“8e. Proposals protect the significance of heritage assets and their settings”.</u>	NULLP510	Historic England
Policy should be widened to consider geo-thermal energy potential from mineshafts	Ground source heat is referenced in the supporting information to the policy (paragraph 6.10)	No change required	NULLP364 NULLP491	S Bland Audley Parish Council
Policy is supported	Noted	No change required	NULLP1097	Staffordshire County Council
Recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies	Noted, the Local Plan is intended to be read as a whole and therefore the structure of the Plan is considered appropriate with no further changes proposed at this stage.	No change required.	NULLP1329	Natural England
Acknowledge that the Local Plan contains decarbonisation policies	Noted	No change required	NULLP1287	National Highways

21. Housing

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No Comments Received				

22. Policy HOU1 Affordable Housing

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
There is little in the Plan around Social Housing	Policies HOU1 & HOU2 suitably cover the topic of social housing.	No change required	NULLP103 NULLP405	C Harrison L Richards
Support for the policy wording.	Noted	No change required.	NULLP653 NULLP728 & NULLP740	Pegasus on behalf of Araripe Limited Knights on behalf of Richborough Estates
The plan should increase its housing requirements to ensure affordable needs are met	This point is considered in proforma PSD1 Overall Development Strategy	No change required	NULLP760	Gladman Developments Limited
Criterion 1 – not clear why varying percentages are given for affordable housing requirements given the evidence of need	The variation of percentages has been informed by the work on viability which has identified variations in viability across the borough	No change required	NULLP874 NULLP1073	Knights on behalf of Aspire. West Midlands Housing Association Planning Consortium
Criterion 1 – supportive of variation between sites	Noted	No change required	NULLP760	Gladman Developments Limited
Criterion 1 – not clear how the percentage figures will meet the criteria of meeting affordable housing need	The percentage figures, when applied to relevant schemes will provide for affordable housing in the Borough. The affordable housing figures presented in the Housing and Economic Needs Assessment are not a target in the Plan. The policy approach set out in policy PSD1 presents the development	No change required.	NULLP975	Keele Parish Council

	requirements for the Borough.			
Criterion 1 – percentage requirements for 1 (A) is too low given affordable housing need	The percentage requirements are considered to represent an appropriate balance between viability considerations and providing for affordable homes in the Borough.	No change required	NULLP1026	CPRE Staffordshire
Criterion 1 – for 1(a) the percentage should be reduced to 20% affordable housing in line with the viability evidence of the Council	The percentage requirements are considered to represent an appropriate balance between viability considerations and providing for affordable homes in the Borough.	No change required	NULLP844	Emery Planning on behalf of the Strategic Land Group
Criterion 1 – should include additional flexibility to note that sites could provide lower levels of affordable housing for site specific reasons	Criteria 4 and 5 of policy HOU1 considers instances where matters of viability and feasibility impact on the delivery of affordable homes on an individual basis.	No change required.	NULLP760	Gladman Developments Limited
Criterion 3 – plan does not specify the type of affordable housing required.	Criterion 3 makes clear that the tenure split for affordable housing will be provided in line with the latest evidence. Policy HOU2 is also relevant here.	No change required.	NULLP1026	CPRE Staffordshire

Criterion 3 – lack of emphasis on shared ownership and affordable rent	Criterion 3 makes clear that the tenure split for affordable housing will be provided in line with the latest evidence. Policy HOU2 is also relevant here.	No change required	NULLP874	Knights on behalf of Aspire
Criterion 3 – reference to first homes should be tempered or removed	Reference to First Homes is considered to be consistent with the December 2023 National Planning Policy Framework.	No change required	NULL874 NULLP854 NULLP1073	Knights on behalf of Aspire. Home Builders Federation West Midlands Housing Association Planning Consortium
Criterion 4 – unclear how a site could show compliance with this policy. Payment in lieu of affordable housing is a more typical approach	The policy makes clear the circumstances where off site financial contributions will be considered and is transparently set out.	No change required	NULLP760	Gladman Developments Limited
Criterion 7 – the Council should take a flexible approach to pepper potting to allow ease of asset maintenance and management	Noted	No change required	NULLP1073	West Midlands Planning Consortium
There is a need to ensure that affordable housing studies include the consideration of the NHS and NHS staff	Noted	No change required	NULLP890	NHS Property Services
There are no specific targets for delivery of affordable / social housing. Policies within the Regulation 19 Local Plan will not lead to the delivery of 278 affordable homes p.a.	The 278 figure is not a target in the Plan. Policy PSD1 sets out the development requirements of the Plan. The delivery of the overall housing	No change required	NULLP1496	Cllr D Jones

	requirement will provide a contribution to affordable housing in the borough in line with the policy approach of HOU1			
Not been able to locate within the Policies Map document any reference to distribution of sites across low and high value zones	The Policies Map includes the low and high value zones [CD02, pg. 14]	No change required	NULLP1496	Cllr D Jones
Rising construction costs has seen a significant number of developments across the borough seek to vary their social housing contributions under 106 agreements. This has led to significant under delivery of these much-needed homes across the borough	The Local Plan has been supported by a viability assessment [ED04]	No change required	NULLP1496	Cllr D Jones
The Council explore alternative options for delivery of affordable and social housing, including the reintroduction of council stock should delivery continue to be deficient	The Council does not build affordable / social housing. The policy approach in HOU1 'affordable housing' will support the delivery of affordable housing in the Borough	No change required	NULLP1496	Cllr D Jones
For public land, minimum percentage affordable housing and social rented homes should be 50%	The policy approach and percentage targets are set out in policy HOU1.	No change required	NULLP1497	Cllr D Jones
Question whether the viability study has factored in costs appropriately	The Viability Study is considered to have been robustly and transparently prepared, including with	No change required	NULLP854 NULLP1034	Home Builders Federation Planning Bureau on behalf of McCarthy Stone

	engagement with the development industry			
Audley ward should be shown as a high value area on the polices map	Based on the evidence in the viability study, Audley is appropriately located in the low value area.	No change required	NULLP874	Knights on behalf of Aspire
Policy should be amended to reflect the recent consultation on the NPPF and associated planning documents	The Final Draft Local Plan currently benefits from transitional arrangements in the consultation document of the NPPF.	No change required	NULLP 1025 NULLP708	CPRE Staffordshire Condate Limited on behalf of J Two Ltd.
The reference to exceptional circumstances would benefit from the introduction of examples	The circumstances would be case by case and so it would be difficult to provide a suitable example in the Local Plan	No change required	NULLP623	Cross Heath, Wolstanton and May Bank Branch Labour Party
There should be a cross reference to policy HOU2	The Plan is intended to be read as a whole and therefore development schemes should consider policy HOU2, where relevant also.	No change required	NULLP1179	Loggerheads Parish Council
Policy should exclude older persons accommodation / specialist housing for older people from providing affordable housing due to viability reasons	It is considered that the policy is appropriately framed for development schemes in the borough, as drafted.	No change required	NULLP1034 NULLP1050	Planning Bureau on behalf of McCarthy Stone Churchill Living

23. Policy HOU2 Housing Mix and Density

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Should include a wider range of factors in determining an appropriate density to use	The policy approach sets out an expected density (in criteria 1) but then notes the circumstances, in criteria 2, which might influence the appropriate density to use, on a case-by-case basis	No change required	NULLP366 NULLP394 NULLP493	S Bland Audley Rural Neighbourhood Plan Steering Group Audley Parish Council
Criterion C - Sites in the Rural Centres should be able to achieve higher densities of between 25-35 dwellings per hectare (dph)	In line with criteria 2 of policy HOU2, if there are circumstances that suggest a higher density can be achieved and justified then that can be considered	No change required	NULLP762	Gladman Developments Limited
Criterion C - Draft Policy HOU2 could work against balanced and diverse new housing across the borough and result in crowded schemes in the strategic (Newcastle-under-Lyme) and urban centres (Kidsgrove).	In line with criteria 2 of policy HOU2, if there are circumstances that suggest a higher density can be achieved and justified then that can be considered	No change required	NULLP762	Gladman Developments Limited
The different densities given in paragraph 1 for new dwellings in the urban and rural centres could encourage developers to focus on three and four bedroom homes in rural locations, while sites in the urban centre could become even more crowded	Criteria 3 of the policy, notes that residential development should be of an appropriate type and size, consistent with the most up to date evidence.	No change required	NULLP624	Cross Heath, Wolstanton and May Bank Branch Labour Party

Criterion 3 - It is considered that regard should be had to the conclusions of the evidence base documents, but there should be no specific housing mix imposed on sites, with housing mix instead informed by market conditions and the demand for housing within the marketplace.	Criterion 3 notes that type and size should be consistent with the most up to date evidence and gives reference to factors that can be considered here.	No change required	NULLP698	Stantec on behalf of Jones Homes and Renew Land Baldwins Gate
Criterion 4 – should specifically mention support for older persons accommodation in sustainable locations	Criterion 4 does mention that location and accessibility of the site should be considered	No change required	NULLP1013	Lichfields on behalf of McCarthy Stone
Changes made since the first draft Local Plan are welcome. However, the broad mix identified in the policy is different to the experienced waiting list	The mix is dependent on the latest evidence position, as set out in criterion 3 of the policy.	No change required	NULLP876	Knights on behalf of Aspire
Reference to aspirational should be added to be consistent with Strategic Objective SO-5(V)	The policy approach in the Local Plan is designed to support the objective, to provide for aspirational homes in the Borough of all types and tenures, as appropriate.	No change required	NULLP654	Pegasus on behalf of Araripe Limited

24. Policy HOU3 Housing Standards

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Criterion 1 – clear evidence and justification is required for the introduction of nationally described space standards	Evidence is provided by ED026 Nationally Described Space Standards Topic Paper.	No change required	NULLP764 NULLP655 NULLP855 NULLP1075	Gladman Developments Ltd Pegasus on behalf of Araripe Limited Home Builders Federation West Midlands Housing Association Planning Consortium
Criterion 1 – reference to conversions should be removed	Reference to conversions is considered appropriate to support the intention of the policy	No change required	NULLP878	Knights on behalf of Aspire
Criterion 1 - assuming the Council means residential development of homes and not 'residential homes' which many would take to mean specialist housing for the elderly.	Noted	Proposed modification to criterion 1 of Policy HOU3, as follows: - "All new residential <u>development</u> homes (including conversions) ..."	NULLP855	Home Builders Federation
Reference to space standards should be moved to a separate criterion and should be subject to transitional arrangements	The Council has signalled the intention of introducing space standards since the First Draft Local Plan in the summer of 2023.	No change required	NULLP878 NULLP855	Knights on behalf of Aspire. Home Builders Federation
Registered providers note that there are viability challenges around the inclusion of space standards and M4(3) provision. Therefore, flexibility should be introduced into the policy in relation to affordable units	Paragraph 7.28 in the supporting text sets out circumstances where the implementation of accessibility standards takes account of site-specific factors	No change required	NULLP878 NULLP1075	Knights on behalf of Aspire. West Midlands Housing Association Planning Consortium
Criterion 2 – the criteria here may be superseded by changes to the building regulations and therefore	Noted. The requirements reflect the current building regulation	No change required	NULLP764	Gladman Developments Ltd

may be duplicating approaches in other regimes	requirements at the time of drafting			
Criterion 2 – flexibility should be provided for on the requirement of Part M4 (3)	Paragraph 7.28 in the supporting text sets out circumstances where the implementation of accessibility standards takes account of site-specific factors	No change required	NULLP764	Gladman Developments Ltd
Criterion 2 – not clear that the circumstances where not appropriate to require M4(2) and M4(3) have been considered such as topography, flooding etc	This is set out in the supporting text, para 7.28	No change required	NULLP855	Home Builders Federation
Given viability challenges, the requirement of M4(3) in value area 1 should be removed	Paragraph 7.28 sets out how viability can influence the implementation of the standards	No change required	NULLP845	Emery Planning on behalf of the Strategic Land Group
An additional criterion 3 should be added to the policy: - Compliance with the site layout guidance, and recommended building security features and minimum physical security standards contained with the Secured by Design Homes Guide is actively encouraged as a means to reduce criminal and anti-social opportunity within development and contribute towards a safer living environment.	Secured by design principles are included in policy PSD6, criterion 6.	No change required	NULLP614	Staffordshire Police

Unsure whether viability study has considered the introduction of standards appropriately	The viability study has appropriately considered the standards proposed in the Final Draft Local Plan	No change required	NULLP855 NULLP1075 NULLP1052 NULLP1035	Home Builders Federation West Midlands Housing Association Planning Consortium Churchill Living McCarthy Stone
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25. Policy HOU4 Gypsy, Travellers and Travelling Showpeople

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Site G&T8 is unsuitable for allocation	See response contained in site proforma G&T8	No change required	NULLP410 NULLP378 NULLP1300	J Sims R Adcock A Drakakis-Smith
A new GTAA should be undertaken with the involvement of the relevant communities	The GTAA (2024 update) provides an appropriate basis for considering the policy requirements in Policy HOU4.	No change required	NULLP468	P Richie

26. Policy HOU5 Specialist Needs Housing

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
N.B this proforma should be read alongside HOU3				
If changes are made to policy HOU3 then they should be reflected in this policy	Noted	No change required	NULLP856 NULLP1036	Home Builders Federation McCarthy Stone
Criteria 1a should be strengthened to make clear that development will only be permitted if requirements are met	The wording of criterion 1(a) is considered to be clear and appropriately framed to ensure development is located in an area that is accessible to services and facilities.	No change required	NULLP626	Cross Heath, Wolstanton and May Bank Branch Labour Party
HOU5 should make clearer that it relates to children in care etc.	Reference to specialist accommodation is considered to cover requirements for children in care.	No change required	NULLP611	Staffordshire Police
Paragraph 7.38 makes clear that the figures in Table 4 are indicative estimates only	Noted	No change required	NULLP1036	McCarthy Stone

27. Policy HOU6 Self Build and Custom Dwellings

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Support criterion 3 of Policy HOU6, which emphasises the need for comprehensive infrastructure consideration on multiple self-build sites. No modifications proposed.	The Council acknowledges United Utilities support of criterion 3 regarding infrastructure considerations for multiple self-build sites. No further action is required.	No change required	NULLP787	United Utilities
Support self and custom-build policies that encourage development by setting out where it will be supported in principle. Consider the policy unsound because the provision of self and custom build plots on major residential development schemes cannot be co-ordinated with the development of the wider site. Agrees with the Council's policy to ensure that self and custom build plots are delivered and do not remain unsold for more than one year. However, HBF suggests reverting unsold plots to open market housing after <i>six</i> months, not one year. No specific modifications proposed to the wording of the policy.	The Council acknowledges the HBF's concerns regarding the integration of self-build plots within larger schemes. The Council is confident that the policy, as written, strikes an appropriate balance between promoting self-build and custom housing and ensuring the timely delivery of market housing. The one-year marketing period is considered sufficient to assess demand and avoids leaving plots undeveloped for extended periods. Therefore, no changes to the policy are proposed.	No change required	NULLP857	Home Builders Federation
Suggest amending Policy HOU6 to increase flexibility, as the current wording does not guarantee delivery of self-build units. Specifically, Gladman proposes changing the marketing period for self-build plots from one year to six months. If unsold after six months, plots should revert to open market housing.	The Council acknowledges Gladman's comments regarding flexibility within Policy HOU6 and their suggestion to reduce the marketing period for self-build plots. The Council believes that the existing one-year marketing period is adequate to gauge market demand for self-build plots and is consistent with national policy and best practice. Additionally, Policy HOU6 includes flexibility to consider alternative approaches in exceptional cases where there are demonstrable viability or delivery issues. Therefore, the Council does not propose any changes to the policy.	No change required	NULLP766	Gladman Developments Ltd

Generally, supports the policy. Suggests amending the policy to encourage small plots for self-build within or adjacent to villages, rather than on large-scale housing sites. Proposes adding the following text: "or small sites of no more than 2 units sites that adjoin villages".	The Council appreciates Mr. Willard's support for the policy and acknowledges his suggestion regarding smaller plots within or adjacent to villages. Whilst the policy does not preclude such development, the Council believes the existing wording provides sufficient flexibility to consider these proposals where appropriate. The emphasis on larger schemes within the policy reflects the need to deliver a significant number of self-build homes to meet identified demand, as evidenced in the Self and Custom Build Register.	No change required	NULLP1234	G Willard
Object to the policy's requirement for major residential schemes to provide self-build plots, citing lack of transparency. Concerned that the Self and Custom Build Register isn't publicly available, making it difficult for developers to assess demand. Also concerned about the lack of clarity on how the self-build requirement will be implemented (fixed percentage or threshold). Recommends the register be made public and that the policy specify the calculation methodology (percentage or development size threshold). Suggests the need/demand for self-build be examined in a housing needs assessment. No specific wording changes are proposed.	The Council acknowledges Jones Homes & Renew Land Ltd.'s concerns regarding transparency and accessibility of the Self and Custom Build Register, as well as the proposed approach to determining self-build plot proportions. The Council intends to conduct a review of the Register's operation, which may include exploring options for publishing summary data, although full publication is restricted by GDPR requirements. The Register remains a reliable source for assessing demand for self-build plots. Additionally, the Council will determine the appropriate proportion of self-build plots on a case-by-case basis, considering both the demand evidenced in the Register and the characteristics of each development. We do not consider a separate Housing Needs Assessment necessary, as it would duplicate the existing data and processes in place. Therefore, no changes to the policy are proposed.	No change required	NULLP700	Jones Homes & Renew Land Ltd
Supports the policy's approach to allowing unsold self/custom build plots to be used for affordable housing after a one-year marketing period, as this could increase affordable housing supply. No modifications proposed	The Council acknowledges WMHAPC support of the policy's approach to affordable housing provision. No further action is required.	No change required	NULLP1076	West Midlands Housing Association Planning Consortium

28. Policy HOU7 Homes in Multiple Occupation

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

29. Policy HOU8 Rural and First Homes Exception Sites

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Supports criterion 1b of Policy HOU8, which emphasises the need for rural and first home exception sites to be appropriately sized and related to the scale and location of the existing settlement. No modifications proposed.	The Council acknowledges United Utilities support of criterion 1b. No further action is required.	No change required	NULLP788	United Utilities
<p>While welcoming the policy in principle and the attempt to define appropriate site sizes (criterion 1b), Aspire suggests refining the definition to provide more flexibility, including different thresholds for Rural Centres versus other settlements. They also suggest amending criterion 1a to acknowledge that some villages may not have large employment sites nearby and may rely on services in other settlements. Regarding the size definition (footnote 7), they propose specific amendments:</p> <ul style="list-style-type: none"> Rural Centres: Site size not to exceed 5% of the settlement or 1 hectare (whichever is lesser) unless local housing need assessment indicates a higher need. Other rural settlements: Site size not to exceed 10% of dwellings in the main built-up area or 0.5 hectares (whichever is lesser) unless local housing need assessment indicates a higher need. This would allow greater flexibility to meet affordable housing needs. Aspire also recommends caution in using Neighbourhood Plan data for the Housing Needs Assessment, suggesting 	The Council acknowledges Aspire Housing's suggestions for refining Policy HOU8. The Council believes the existing policy wording is sufficiently flexible and consistent with the existing NPPF. The proposed specific thresholds are considered overly prescriptive. The Council will ensure any Neighbourhood Plan data used is robust and will continue dialogue with Registered Providers regarding the perpetuity clause, in line with current national policy requirements. No changes to the policy are proposed at this time.	No change required	NULLP880	Aspire Housing

criteria for data reliability. Finally, they support criterion 1h (allowing market housing to support exception site viability) and suggest discussions with registered providers on the perpetuity clause in criterion 1e.				
Supports the policy but believes it overemphasises First Homes and suggests a broader approach to affordable housing tenures. Also, suggests adding clause h to Part 1: "h. If the survey and assessment indicate a need for First Homes, these may be included providing that: - the homes will remain first homes in perpetuity; the first homes provided are occupied by first-time buyers who meet the local connection test;" Recommends removing the following from Part 2: "2. In addition to the requirements above, proposals for first homes exception sites will be permitted where the following criteria are met: a. the proposed development is located on unallocated land outside the Green Belt;" and amending Part 2 b to remove "and First Home." Finally, proposes replacing paragraph 7.65 with text focusing on the design, layout, and indistinguishability of tenures.	The Council acknowledges Mr. Windmill's comments regarding the emphasis on First Homes and affordable housing tenures in Policy HOU8. Whilst the Council appreciates these comments and recognises the direction of the draft revised NPPF, we believe that the current policy wording is robust, provides sufficient flexibility, and aligns with the NPPF. The policy allows for consideration of a range of affordable housing tenures, including First Homes, based on demonstrable local need and viability. The suggested amendments, including the proposed revisions to paragraph 7.65 of the supporting text, are therefore not considered necessary at this time. The design and integration principles raised by Mr. Windmill are addressed within the broader context of the Local Plan, particularly through policies such as PSD7 (Design), which promotes high-quality design in all new development. The Council is committed to reviewing and updating the Local Plan, including Policy HOU8, following the adoption of the final revised NPPF to ensure full alignment with national policy and guidance. This approach allows the Council to maintain a plan-led system, avoids premature changes based on draft guidance, and ensures the Local Plan remains consistent with adopted national policy.	No change required	NULLP919	P Windmill
States that national policy is changing regarding affordable housing and the requirement for	The Council acknowledges J. Two Ltd.'s comment regarding the changing national policy on First	No change required	NULLP709	J. Two Ltd

First Homes will be removed. Therefore, Policy HOU8 should be revised by removing 'First Homes' from the title and deleting point 2.	Homes. The Council is confident that Policy HOU8 aligns with the currently adopted version of the NPPF. The Council is committed to reviewing and updating the Local Plan, including Policy HOU8, following the adoption of the final revised NPPF to ensure full alignment with national policy and guidance. No changes will be made to the policy at this stage.			
Supports the standalone policy for rural exception sites and highlights its importance in sustaining rural communities. Raises concerns about the effectiveness of First Homes as a route to delivering affordable housing. Notes that Policy HOU9 requires exception sites not to exceed 1 hectare or 5% of the settlement size, and while this is an NPPF requirement for Community Led Exception Sites, it does not apply to Rural and First Homes Exception Sites. Suggests removing this requirement from HOU8, as it may hinder affordable housing delivery.	The Council acknowledges WMHAPC's support for the rural exception sites policy and their comparison with the site-size criteria applied to Community Led Exception Sites in Policy HOU9. WMHAPC correctly notes that Policy HOU9 contains a size limit for Community-Led Exception Sites. This size limit, which is a requirement of the NPPF for this specific type of exception site, helps ensure these developments remain small-scale and proportionate to the surrounding area. However, there is no equivalent size restriction in the NPPF for Rural and First Homes Exception Sites (as defined in Policy HOU8). Therefore, the Council considers that imposing a similar size restriction on sites covered by Policy HOU8 is unnecessary and could hinder the delivery of much-needed affordable housing in rural areas. The current wording, which requires assessment of site size in relation to the existing settlement, provides sufficient flexibility while still ensuring that exception sites are proportionate to their context.	No change required	NULLP1078	West Midlands Housing Association Planning Consortium

30. Policy HOU9 Community Led Exception Sites

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Support criterion 1c of Policy HOU9, which emphasises the need for community-led exception sites to relate to the scale and location of the existing settlement. No modifications proposed.	The Council thanks United Utilities for their support of criterion 1c of Policy HOU9. The existing policy requirement for community-led exception sites to relate to the scale and location of the existing settlement is considered appropriate and ensures that such development respects local context and is in keeping with the surrounding area. No changes to the policy are proposed.	No change required	NULLP789	United Utilities
Acknowledges Community Led Exception Sites as an effective policy tool for delivering affordable housing. Highlights the successful track record of Community Land Trusts (CLTs) in delivering affordable housing and suggests the Local Plan acknowledge this working relationship to encourage commitment to supporting CLTs in their choice of sites.	The Council thanks the WMHAPC for their support of Policy HOU9 and acknowledges the valuable contribution that Community Land Trusts (CLTs) make to delivering affordable housing. The Council is committed to supporting the development of affordable housing through a variety of means, including community-led initiatives. The Council believes that Policy HOU9, in its current form, provides a robust and effective framework for enabling community-led housing development, and that specific reference to CLTs within the policy is unnecessary. The existing policy wording is consistent with national policy and guidance and allows for the consideration of proposals from a range of community groups, including CLTs. The Council will, however, consider providing further guidance to CLTs and other community groups on how they can participate in the Local Plan process and access relevant funding and resources for community-led housing projects. This guidance could be delivered through supplementary planning documents or other appropriate means,	No change required	NULLP1079	West Midlands Housing Association Planning Consortium

	without requiring changes to the adopted Local Plan.			
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31. Policy HOU10 Extensions, Alterations and Relationships Between Dwellings

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

32. Policy HOU11 Tandem or Backland Development

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

33. Employment

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Designating Chatterley Valley as a strategic enterprise zone would bring substantial economic, social, and environmental benefits to Newcastle-under-Lyme. It would unlock the area's potential for attracting investment, creating jobs, and fostering innovation while aligning with national strategies for regional development and sustainability. With its strong transport links and potential for brownfield redevelopment, Chatterley Valley is ideally positioned to become a thriving hub of economic activity.	Noted. Issues of employment land supply, including the contribution Chatterley Valley makes, are detailed as part of ED001 Housing & Economic Need Assessment 2024.	No change required.	NULLP1496	Cllr D Jones
Comments submitted at earlier stages of Local Plan preparation should be considered in full.	Noted. Regulation 22 Consultation Report (Parts 1 & 2) detail the mechanisms of engagement and the issues raised by interested parties that have been take account of.	No change required.	NULLP434	S Withington
The evidence base presents mixed messages and this is amplified by the use of new & replacement documents being added	Noted. It is considered that the evidence base as submitted is clear, concise (as is feasible), relevant and proportionate.	No change required.	NULLP434	S Withington

Considered that much of the development is concentrated in the north of the borough, and there is not an even distribution of employment uses	ED031 Plan Strategy Housing Topic Paper sets out the proposed spatial strategy, and in its formulation considered aspects, including, national and local policy, key evidence studies, Sustainability Appraisal (SA), and responses received to the previous Local Plan consultation stages.	No change required.	NULLP434	S Withington
Strong objection to site AB2 reiterated, with detailed rationale for this stance including Green Belt & traffic impacts.	This is considered further in the site-specific pro-forma for AB2	No change required.	NULLP335	Audley Parish Council
Green belt assessments associated with site AB2 and the durability of boundaries in the longer term was challenged. The potential for further encroachment, and the enhanced risk to the Green Belt that remains was also highlighted. Analysis, & consistency of analysis, within the SHELAA for site AB2 is questioned. Prospective conflicts between evidence base assertions (Heritage Assessment) and those of the developers of site AB2 were felt to be in conflict and may result in it not being possible to preserve any of the locally important heritage features.	Noted. Policy AB2 refers explicitly to the requirement for submission of a Heritage Impact Assessment as part of development proposals. Impacts on landscape and visual receptors, as well as the creation of defensible boundaries, are also specifically highlighted as to their significance for consideration. Evidence base document ED008 Green Belt Assessment evaluates sites (including	No change required.	NULLP342	C Withington

	AB2) against the five purposes of Green Belt.			
Acknowledged need for economic growth as the key driver for greater prosperity in the borough. Wishes to explore what alternative proposals to site AB2 (which has generated significant public opposition) have been explored within the Local Plan – protection of valued green space being integral to this. This includes working with the Council to identify emerging markets to bring about job creation, best utilise the skilled workforce & industrial legacy, with it considered that the strategy currently appears to focus solely on the warehouse & distribution sector, located within a specific area of Green Belt in Audley.	Noted. 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.	No change required.		MP for Newcastle under Lyme (A Jogee)

34. Policy EMP1 Employment

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Strong objection to site AB2 reiterated, with detailed rationale for this stance including Green Belt & traffic impacts.	This is considered further in the site-specific pro-forma for AB2	No change required	NULLP494	Audley Parish Council
Supporting evidence and arguments presented in relation to strategic employment site allocation AB2 are considered to be factually incorrect, and therefore invalid.	Noted. Evaluation of the robustness of justification for sites, including AB2, will be an integral part of the Local Plan Examination.	No change required	NULLP367	S Bland
Strong objection to site AB2 reiterated, with detailed rationale for this stance including Green Belt & traffic impacts.	This is considered further in the site-specific pro-forma for AB2	No change required	NULLP395	Audley Rural Neighbourhood Plan Steering Group
Policy EMP1 is supported. Requirements for the provision of Employment & Skills Plans are also welcomed, as well as the direct reference within the list of supporting documents to the County Council's own Staffordshire Employment and Skills Plan.	Noted	No change required	NULLP1091	Staffordshire County Council (J Chadwick)
The emphasis for employment uses is considered to be based upon on location (i.e. proximity to the M6). The focus on logistics & warehousing does not reconcile with encouraging high value roles and a shift away from low waged & low skilled opportunities. Greater aspiration is required to make best use & full advantage of the	Noted. 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	No change required	NULLP1270	Thistleberry Residents Association (A Drakakis-Smith)

qualifications and skills that can be obtained by employees. Ambitions should be set higher accordingly in terms of what the yardstick for uplift in the employment offer is.	locations, two of which (AB2 & KL15) are allocated within the Final Draft Local Plan.			
Acceptance that identifying sites for industrial or commercial development is essential for the Borough's future prosperity, and that a mix of sites, differing in size and location, should feature in the Local Plan.	Noted	No change required	NULLP627	Cross Heath, Wolstanton & May Bank Branch Labour Party (Richard Gorton)
Masterplanning exercises & the council's role within this should be integral to avoiding piecemeal or ad hoc development in strategic employment sites.	Noted. Policy SA1: General Requirements details the approach towards Masterplans & their indicative broad content and aspects to address.	No change required	NULLP627	Cross Heath, Wolstanton & May Bank Branch Labour Party (Richard Gorton)
Creation of formalised lorry park provision (for example, as referenced by para 8.3) is welcomed.	Noted	No change required	NULLP627	Cross Heath, Wolstanton & May Bank Branch Labour Party (Richard Gorton)

35. Policy EMP2 Existing Employment Sites

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Inclusion within the policy of the agent of change principle is welcomed, as it is necessary to protect important industrial sites such as Chesterton Concrete Plant (operated by Tarmac Trading Limited). Its specific referencing is considered to be consistent with the existing and draft NPPF.	Noted	No change required	NULLP327	Tarmac Trading Limited (A Job)
The emphasis for employment uses is considered to be based upon on location (i.e. proximity to the M6). The focus on logistics & warehousing does not reconcile with encouraging high value roles and a shift away from low waged & low skilled opportunities. Greater aspiration is required to make best use & full advantage of the qualifications and skills that can be obtained by employees. Ambitions should be set higher accordingly in terms of what the yardstick for uplift in the employment offer is.	Noted. 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.	No change required	NULLP1269	Thistleberry Residents Association (A Drakakis-Smith)
Strongly object to the policy as drafted as it does not align with the NPPF. The wording is such that it could potentially facilitate the development of existing B2 operations without a robust assessment and consideration of its impact on the ongoing operation	Noted. The policy as drafted sets out a number of criteria that needs to be addressed prior to alternative uses of development being considered.	No change required	NULLP997	Allied Bakeries (Rapley's LLP – W Hirose)

and potential growth of businesses. In particular, the reference to considering alternative uses positively is inappropriate where the intention of the policy is to retain existing employment areas & businesses. How criteria a) and d) should be evaluated in the decision-making process is unclear, nor are they robust in ensuring existing businesses can operate and grow.				
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36. Policy EMP3 Tourism

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Specific reference to the historic environment is supported. Beyond this, the policy should be clear that it backs heritage tourism and will seek opportunities for appropriate such uses.	Noted. The Council considers this issue is addressed with various references made in Policy EMP3 to historic buildings & the historic environment, including within its Supporting Information, allied to cross referencing to other relevant policies such as RUR1 Rural Economy & SE9 Historic Environment.	No change required	NULLP511	Historic England (K Taylerson)
Amend (within para 8.13) the term 'historic assets' with 'heritage assets'	Noted.	In paragraph 8.13, to replace historic with heritage with reference to assets	NULLP512	Historic England (K Taylerson)

37. Retail

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

38. Policy RET1 Retail

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
There needs to be far more emphasis on diversification and uses that bring people into towns and high streets, for example food and drink, recreation, cultural uses, community facilities and other local facilities.	The policy approach defines boundaries and a hierarchy of retail centres. It also supports main town centre uses focused on main town centres and seeks to support town centre areas.	No change required	NULLP495 NULLP396	Audley Parish Council Audley Rural Neighbourhood Plan Steering Group
Audley is incorrectly listed as a District Centre - it should be a Local Centre.	Audley is a local centre in the Plan. Church Street is a district centre for retail purposes, in line with the requirements of policy RET1 'Retail'.	No change required	NULLP396	Audley Rural Neighbourhood Plan Steering Group
There was no reference in the draft Local Plan or Policy RE1 to the Wolstanton Retail Park and we would ask the Borough Council to explain how the Plan would relate to changes to the Retail Park, including the alteration of existing units and the construction of new shops. The draft Plan does not refer to the need to improve the current access to Wolstanton Retail Park as this is an important reason why some residents prefer not to shop at the Park	Wolstanton Retail Park is an out of centre retail park and is not defined in the retail hierarchy. Criteria 5 of policy RET 1 sets out the policy approach for retail and leisure uses located outside of a defined centre.	No change required	NULLP628	Cllr R Gorton (Cross Heath, Wolstanton and May Bank Branch Labour Party)

The policy does not reflect and therefore misaligned with current views on the mechanisms for encouraging high street recovery. Far greater emphasis on the diversification and uses that attract the members of the public into towns and high streets is required (e.g. food and drink, recreation, cultural uses, community facilities and other local facilities).	The policy approach defines boundaries and a hierarchy of retail centres. It also supports main town centre uses focused on main town centres and seeks to support town centre areas.	No change required	NULLP369	S Bland
Currently there are retail units which have never been wholly occupied (or have seen constant short-term turnover) in and around the town centre. Have the reasons for this phenomenon been factored into future developments, or the estimated suggested allocations, so that unnecessary demolition and destruction do not become part of the Plan? Have the reasons for the demise of the town been sufficiently analysed and considered in order to avoid making the same mistakes?	The Local Plan is supported by an updated retail and leisure study [ED010] which has considered the outcomes of 'health checks' on a number of centres in the Borough.	No change required	NULLP1265	Dr A Drakakis-Smith (Thistleberry Residents Association)
The issue of car parking in and around Newcastle-under-Lyme town centre, which has not been satisfactorily resolved, has had an impact on retailing in an already declining and reduced retail offer. Online shopping and the changed behaviour of customers, evident before Covid, and more pronounced	Separately to the Local Plan, the Council is preparing an update to its current car park strategy for the Borough. The Local Plan is supported by an updated retail and leisure study [ED010] which has	No change required	NULLP1304	Dr A Drakakis-Smith (Thistleberry Residents Association)

afterwards, has reduced the patronage of high street shops. The cross-cutting issues compounding the decline of the high Street need to be satisfactorily explored and resolved if the Plan is to be effective over the next 20 years.	considered the outcomes of 'health checks' on a number of centres in the Borough.			
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39. Policy RET2 Shop Fronts, Advertisements, New Signage

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
We consider that the wording is not appropriate in its current format. The wording should refer to heritage assets (designated and non- designated) including Conservation Areas and their settings and then set out what is and is not appropriate in the context of heritage assets. For example, illuminated signs should be resisted and not carefully considered. Would benefit from including relevant details about shutter types too.	Noted	A change is proposed for criteria 2, as follows: - <u>In schemes impacting on heritage assets (designated and non-designated) including Conservation Areas and their settings</u> Conservation Areas and / or near Listed Buildings.....	NULLP513	Historic England

40. Policy RET 3 Restaurants, Cafes, Pubs and Hot Food Takeaways

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The restrictions set out in paragraph 3 concerning the proximity of hot food takeaways to schools and their hours of trade should be welcomed. The Branch also endorses the commitment given in the Plan to curbing the growth of hot food takeaways in parts of Newcastle. We are delighted to note the stress placed by this section of the draft Plan on health awareness and promotion.	Noted	No change required	NULLP629	Cllr R Gorton (Cross Heath, Wolstanton and May Bank Branch Labour Party)

41. Policy RET4 NUL Town Centre

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
We support the inclusion of this clause.	Noted	No change required	NULLP514	Historic England
Aspire has no objections to this policy per se, however the policy refers to Towns Deal funding. This includes locations such as Cross Street, which is not included in the wording of the policy and Aspire consider that this should be included alongside the reference to the Knutton Village Masterplan at criteria 1g.	It is considered that the Cross Street proposals are not frustrated by the policy wording and so can continue without necessarily being referenced in the Local Plan.	No change required	NULLP881	Aspire Housing

42. Policy RET5 Kidsgrove Town Centre

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
This policy would benefit from the inclusion of the same clause, as in, Policy RET4 Clause 3.	Noted and agreed	A new criterion 2 to state, as follows: - <u>2)Development should conserve and enhance heritage assets in the town centre</u>	NULLP515	Historic England
The policy needs to be much broader in order to stimulate further investment and development. Indeed, given the aspiration to drive the regeneration of Kidsgrove, the overall policy context – including the housing target detailed within Policy PSD3 – is somewhat lacking. Gaps within Policy RET5 included opportunities to diversify the town centre’s offer beyond retail and other associated uses, and the importance of increased residential development, particularly in locations that benefit from public transport links to the town centre.	It is considered that this policy, when considered alongside RET1 supports the appropriate balance between supporting town centre and retail uses within the designated centre but also providing for improvements to the wider town centre environment.	No change required	NULLP710	J. Two Ltd (A and K Johnson)
Policy RET5: Kidsgrove Town Centre Part 1(b) currently worded Enhancement of, and improved access to, the Trent and Mersey Canal. We suggest that you use Trent & Mersey Canal with '&' for consistency.	Noted	To amend the policy to refer to Trent & Mersey Canal	NULLP199	Canal & Rivers Trust

43. Infrastructure and Transport

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The current infrastructure is unable to support local residents	The Final Draft Local Plan was informed by infrastructure evidence including the Infrastructure Delivery Plan.	No change required	NULLP251 NULLP19	N Ginnis CT Lomax
Local Schools are at capacity	Engagement has taken place with agencies including Staffordshire County Council LEA to inform education provision in the IDP & the site-specific policy approach.	No change required	NULLP251	N Ginnis
Roads are unable to cope with existing levels of traffic, parking is an issue	A Strategic Transport Assessment (ED011) has been prepared to consider the allocations in the Plan and identify any mitigation measures required	No change required	NULLP251	N Ginnis
Recognition is made of the importance of robustly assessing the transport implications of proposals as part of the Local Plan's evidence base.	A Strategic Transport Assessment (ED011) has been prepared to consider the allocations in the Plan and identify any mitigation measures required	No change required	NULLP946	MP for Newcastle under Lyme (A Jogee)
Concerns relayed from local residents at the lack of public transport provision in the borough's rural communities. Cuts to bus	Noted. Public transport provision is a key component of the analysis undertaken in	No change required	NULLP946	MP for Newcastle under Lyme (A Jogee)

<p>services & the absence of alternative provisions need addressing, whilst also planning for future expansion of communities. More detailed collaboration with transport providers across the North Staffs conurbation is advocated to enhance connectivity for businesses & householders.</p>	<p>the Infrastructure Delivery Plan and the promotion of active travel & public transport enhancements is referenced at numerous points in the Local Plan, including in Policy CRE1 Climate Change & Policy IN2 Transport and Accessibility.</p>			
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44. Policy IN1 Infrastructure

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Where there are opportunities identified to make existing footpaths useable for cyclists or new paths connecting the network, these should multi-user routes for all vulnerable road users, including equestrians. Through making provisions for shared routes for all user groups this will engage wide range of users, futureproof their usage and impact positively on health, wellbeing & road safety.	Noted. The opportunities that may be afforded by such multi-user routes will be evaluated in future iterations of the Infrastructure Delivery Plan (with due regard to relevant documents including the Local Transport Plan) and should also be viewed in the context of the wider active travel ambitions detailed in various parts of the Local Plan. This issue is also touched upon in Policy IN4.	No change required	NULLP269	The British Horse Society (W Bannerman)
Reference should be made to both green & blue infrastructure to ensure consistency between IN1 and the IDP.	Noted. Green & Blue infrastructure has a discrete policy within the Local Plan - SE14 - that addresses aspects of its provision, allied to its stated value in abating climate change and positive design influences.	Modification proposed to add to criterion 5, Green and Blue Infrastructure	NULLP216	Sport England (R Bahey)
Questioned as to whether there is evidence available to highlight what assessment has been undertaken regarding the potential harm to	Both transport schemes would be subject to their own discrete approval processes. That being	No change required	NULLP518	Historic England (K Taylerson)

heritage assets, when routes (those identified under 13. of IN1) are being developed. The supporting information or related documents make no reference to this.	said, the link road referenced in the Keele (KL13/15) and TB19 sites have been considered through the Heritage Impact Assessment			
Support is given to the inclusion of 5. and the reference to the historic environment.	Noted	No change required	NULLP516	Historic England (K Taylerson)
The policy's intention to secure developer contributions for infrastructure and facilities, subject to viability is supported. Inclusion within the supporting text would however be welcomed to allow for negotiation regarding contributions to ensure an appropriate level of flexibility where development is rendered unviable by a proposed planning obligation.	The Supporting Information (para 10.5) states that the Council is open to pre-application discussions as to the nature and extent of contributions made. Variations in priority dependent upon the area, existing capacity & locally specific priorities are also acknowledged in the text. Collectively these provide the scope for a requisite level of flexibility being attained.	No change required	NULLP769	Gladman Developments (R Wilding)
1, 2 & 4 relating to the delivery of infrastructure especially that for water & wastewater is welcomed. 10. should be expanded to include text to emphasise the coordination of both development and infrastructure.	Noted. The Council considers this issue is adequately addressed by the provisions of the Phasing & Delivery Strategy highlighted in 10. & the Supporting Information which emphasises the aim of	No change required	NULLP790	United Utilities (A Leyssens)

	the policy is to deliver infrastructure in a timely & co-ordinated way.			
The value of the IDP is acknowledged, but it is hoped that new development will be accompanied by either new infrastructure or improvements to existing services & facilities as the condition of some of those in place currently is poor.	Noted. 3. of IN1 makes explicit reference to the provisions of the 1990 Town & Country Planning Act and the Council will accord with this & other relevant provisions, primarily that planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms.	No change required	NULLP630	Cross Heath, Wolstanton & May Bank Branch Labour Party (R Gorton)
The policy is not considered to be sound as it is not justified, effective or in line with national policy. S106 contributions cannot be required to address existing shortfalls in provision, so it essential to have an up to date and robust evidence base and calculate any contributions at the time a planning application is made. The policy should make clear that any such requests for contributions to mitigate the impact of development will be considered at the decision-making stage.	3 of IN1 makes explicit reference to the provisions of the 1990 Town & Country Planning Act and the Council will accord with this & other relevant provisions, primarily that planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms - with	No change required	NULLP858	Home Builders Federation (R Danemann)

	due reference to the Planning conditions and obligations section of the NPPF.			
Whilst the need to secure the funding of infrastructure necessary to make development acceptable in planning terms, it is noted that local healthcare trusts often request contributions towards healthcare provision. However, such contributions should be justified and transparent, with account taken of recent case law. The Council's approach to securing healthcare contributions and what those contributions can be used for should be set out in Local Plan policy. These points were also raised as part of the Regulation 18. Consultation.	Noted. Whilst it is acknowledged that health care provision is directly referred to in 5. this does not indicate any degree of priority being affording to this type of infrastructure provision. Indeed, within the Supporting Information, the role of the IDP in prioritising infrastructure is emphasised and that site specific variations can influence the nature and extent of contributions made.	No change required	NULLP730	Richborough Estates (A Corinaldi-Knott)
A request is made that the Council continues its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed in the Local Plan & as identified in the IDP.	Noted. The Council will endeavour to continue & build upon the engagement to date with the NHS in collating future iterations of the infrastructure evidence base.	No change required	NULLP892	NHS Property Services (D Fleet)
In contrast to open market schemes, there appears to be no scope to reduce the level of	Noted. The Council acknowledges the position regarding	No change required	NULLP882 NULLP1080	Aspire Housing (A Corinaldi-Knott) West Midlands Housing Association (L Luong)

<p>planning obligations for 100% affordable housing schemes, where such contributions would render the proposals to be unviable. Exemptions/reductions/changes in approach that do not compromise viability should therefore be considered.</p>	<p>affordable housing schemes, however the Supporting Information (para 10.5) states that the Council is open to pre-application discussions as to the nature and extent of contributions made. Variations in priority dependent upon the area, existing capacity & locally specific priorities are also acknowledged in the text. Affordable housing schemes would potentially (dependant on individual circumstances) fall under the site-specific variations alluded to.</p>			
<p>Within 1. there is no mention of EV infrastructure & therefore it is requested that IN1 be amended to provide explicit support for the delivery of such development, which will help ensure the area's future infrastructure needs are fully met.</p>	<p>Noted. The Council considers that this issue is adequately addressed through the provisions of Policy SE1: Pollution and Air Quality where it directly refers to...'Promoting the use of low carbon emission vehicles and facilitating the provision for electric charging facilities'. Policy IN2 also refers to providing the necessary</p>	<p>No change required</p>	<p>NULLP714</p>	<p>Evolution 500 (B Weatherley)</p>

	infrastructure to support low and ultra-low emission vehicles.			
The Local Plan as presented fails to address how education will be supported & alleviate wider structural failings, including SEND provision. More detail on issues such as the quality & quantity of affordable housing; creation, maintenance & repair of roads; flood risk; health & care services, are highlighted. More detailed plans for delivery and the collaboration undertaken with neighbouring LA's, infrastructure providers and environmental bodies is also sought.	Noted. Provision for Special Educational Needs & Disabilities is considered within evidence base document Infrastructure Delivery Plan, which forms an integral part of the determination of the what, how, when & where infrastructure of varying types will be sought. Dialogue with Staffordshire County Council & the neighbouring authorities has been undertaken over the production timeframe of the Local Plan and this is detailed as part of Duty to Cooperate Statement of Compliance	No change required	NULLP947	MP for Newcastle-under-Lyme (A Jogee)
Support is given to the policy, with particular reference to the IDP, education provision and the allocation of Land at Madeley High School to allow for its expansion. Staffs County Council will also work collaboratively to forecast the future operation of the Talke signals junction, & it is suggested that with	Noted. Support for the Madeley High School expansion is welcomed, as well as the suggested modifications to reflect what is required to facilitate the Talke Signals improvement scheme.	Include as a new para after para 10.6: The highway scheme listed at IN1 - 13(b) Improvements to Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill) - will require part of the existing green space (Thomas Street Open Space)	NULLP1087	Staffordshire County Council (J Chadwick)

a requirement for land (greenspace) being incorporated into the highway to facilitate the improvement scheme, this should be reflected in the supporting information text.		fronting the A34 to be brought into the highway to facilitate delivery of the improvement set out in the Strategic Transport Assessment.		
The Council has not sought to maximise infrastructure delivery through the Local Plan. Allocations could instead have been designed to deliver sufficient housing & employment to bring about improvements in highways, health care and community services. For instance, the justification for provision of a second country park in Silverdale (Lyme Park – SP11) is absent or not clearly expressed. Nor is the intended approach to its delivery or maintenance set out. IN1 should therefore be expanded to include text that emphasises the significance of delivering Lyme Park.	The Council considers that the approach to the overall development strategy, settlement hierarchy and distribution of development is robust reflecting in particular on Policies PSD1-3 and the totality of the evidence base. Policy SP11 refers to the preparation and agreement of a Masterplan and Design Code and this will further elucidate the Council's stance on the country park and the associated mechanisms for its delivery and maintenance.	No change required	NULLP1235	WW Planning (G Willard)
Support is given to the inclusion of financial contributions being made towards flood prevention.	Noted	No change required	NULLP1369	Environment Agency (E Millband)
With direct reference to the IDP, any errors or omissions need to be rectified to accurately reflect the	Noted. Any highlighted errors or omissions will be considered in further	No change required	NULLP1169	Loggerheads Parish Council (J Love)

situation and to include all mitigations required to deliver development	iterations of the Infrastructure Delivery Plan			
References in the IDP to an infrastructure levy are considered to not reflect the government's approach. Allied to this S106 and S278 contributions can be challenged by developers on the grounds of financial viability and by their nature fail to look at infrastructure delivery on a holistic basis. The policy also does not specify whether S106 contributions linked to developments will be subject to local consultation (e.g. reflecting policies in neighbourhood plans) and so may well not be properly aligned to local needs.	Future iterations of the IDP will consider any shifts in Central Government approaches to developer contributions. Any changes in the regime are also highlighted in 3. of IN1. Deliverability of schemes will be factor in what is appropriate to request, as well as site specific factors and local priorities as highlighted in the Supporting Information.	No change required	NULLP1173	Loggerheads Parish Council (J Love)
Wider infrastructure related comments that present detailed thoughts on the transport evidence base and the modelling applied to the traffic impacts of the proposed allocations, and the identified transport development schemes of the IDP. Duty to Cooperate and a commitment to work with the council in establishing a SoCG to address any strategic cross boundary issues is also highlighted.	Noted. The Council will endeavour to continue & build upon the engagement to date with National Highways in collating future iterations of the infrastructure evidence base.	No change required	NULLP1282	National Highways (D Pyner)
In terms of education, there is a concern as to the approach to direct engagement with schools, & in	Noted. Dialogue with Staffordshire County Council will remain	No change required	NULLP1499 NULLP1496	Cllr D Jones Cllr D Jones

particular the perceived view that this has been inequitable to schools in the Keele, Knutton & Silverdale catchment areas. This is especially significant owing to what the impact on pupil numbers for existing schools should a new school be built at Lyme Park (SP11). Potential expansions of existing estates to increase pupil capacity should be fully explored.	ongoing to understand the evolving position in terms education requirements across the borough, which will be influenced in part by shifts in demographics, & this will be reflected in future iterations of the IDP.			
For health & social care, there are capacity issues in many locations across the borough, with some of this attributed to the level of growth experienced in recent years. Recognition is made of the commentary in the IDP stating that almost all (bar one) of the GP surgeries are at full patient capacity. The lack of an identified development allocation within the Local Plan to meet the rising demands of adult social care is also raised. Engagement with Staffs County Council & Primary Care Networks is advocated to address these issues.	Noted. These issues have been considered as part of the Infrastructure Delivery Plan and will continue to be evaluated as part of future iterations of this document. Work to date has been heavily informed by dialogue with the NHS and this will continue to be the case to best ensure contemporary demands are fully reflected.	No change required	NULLP1499 NULLP1496	Cllr D Jones Cllr D Jones

45. Policy IN2 Transport and Accessibility

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The Local Plan should have firm detailed and costed plans for a fully integrated transport plan that serves the current and proposed needs of communities. Key public transport issues and pressures (e.g. journey times, frequency & viability) are not addressed, nor are solutions provided to alleviate wider concerns such as links to the strategic road network and rail operations.	Noted. The evidence base, including the Strategic Transport Assessment ED011 is considered to be relevant and proportionate to that required in the production of the Local Plan. Transport schemes and the alleviation of impacts of new development are also detailed within the Infrastructure Delivery Plan	No change required	NULLP1496 NULLP1498	Cllr D Jones
Traffic through the village on the A531 has increased significantly over the last decade or so and has now reached the point where at peak times it is already difficult to cross the road. If there was any further development in neighbouring wards the situation would be worse. Going forward, a significant increase in the traffic may require a radical solution	A Strategic Transport Assessment (ED011) has been prepared to consider the allocations in the Plan and identify any mitigation measures required.	No change required	NULLP265 NULLP266	Betley, Balterley & Wrinehill Parish Council (M Clough)
Whilst acknowledging that IN2 addresses the need for sustainable transport & and provisions for electric vehicles, it is considered that there are several key	Noted. The Council considers that this issue is adequately addressed through the provisions of Policy SE1: Pollution and	No change required	NULLP5	A O' Sullivan

<p>shortcomings. These include: a lack of specificity in not setting clear measurable targets for the deployment of EV infrastructure; not sufficiently addressing the need to upgrade existing EV infrastructure; no detailed plan for the implementation and monitoring of EV infrastructure; not complying with the NPPF as it lacks the detail & ambition needed to support the adoption of EV's and ensure their long-term sustainability.</p>	<p>Air Quality where it directly refers to...'Promoting the use of low carbon emission vehicles and facilitating the provision for electric charging facilities'. Parking Standards (Appendix 3) also refer to the provision electric vehicle charging, and any shifts made in building regulations will be applied accordingly.</p>			
<p>Where there are opportunities identified to make existing footpaths useable for cyclists or new paths connecting the network, these should multi-user routes for all vulnerable road users, including equestrians. Through making provisions for shared routes for all user groups this will engage wide range of users, futureproof their usage and impact positively on health, wellbeing & road safety.</p>	<p>Noted. The opportunities that may be afforded by such multi-user routes will be evaluated in future iterations of the Infrastructure Delivery Plan (with due regard to relevant documents including the Local Transport Plan) and should also be viewed in the context of the wider active travel ambitions detailed in various parts of the Local Plan. This issue is also touched upon in Policy IN4</p>	<p>No change required</p>	<p>NULLP270</p>	<p>The British Horse Society (W Bannerman)</p>
<p>This policy should include a clause on the historic environment and the need to protect the significance of</p>	<p>The policy details the importance of sustainable travel and</p>	<p>No change required.</p>	<p>NULLP519</p>	<p>Historic England (K Taylerson)</p>

heritage assets, including their setting. The section – 6 – that deals with waterways would benefit from inclusion of a reference to heritage assets, such as Canal Conservation Areas etc.	access issues predominantly. As the Plan is intended to be read as a whole, it is not considered appropriate to include a reference to the historic environment in the Policy at this time.			
Whilst the policy is generally supported, amendments are suggested to ensure consistency of approach and references to the relevant transport policy and strategy documents of the County Council. This includes under section 8 a reference being added to the Local Cycling & Walking Infrastructure Plan and Borough Integrated Transport Strategy. Clarity in references to the LTP within the policy's Supporting Information' should also be made.	Noted. Support from Staffordshire County Council is welcomed and the value of making the suggested modifications to avoid duplication and misinterpretation is acknowledged.	<p>'8. Development should take account of the Local Transport Plan and associated documents including the Borough Integrated Transport Strategy, Bus Service Improvement Plan and Local cycling and Walking Infrastructure Plan.'</p> <p>Paragraphs 10.13 and 10.16 should be merged to create the following wording to avoid duplication/misinterpretation:</p> <p><u>'The Local Transport Plan, prepared by the County Council provides for an important reference guide to how the highway authority will respond to planning applications. The Local Transport Plan and associated documents should be considered in the development of any planning application. The most up to date iteration of the Infrastructure Delivery Plan will also be a significant determinant</u></p>	NULLP1092	Staffordshire County Council (J Chadwick)

		<u>in establishing appropriate mitigation requirements.'</u>		
Local Plan wider views expressed, which covered aspects such as it being felt that the document does not pay sufficient attention to the challenges of using public transport, especially in rural areas. It also fails to identify any major improvements to the road network, for instance there are no references to improving access to the M6 at junctions 15 & 16.	Noted. Policy IN1 makes explicit reference to support being given to transport infrastructure identified through the Strategic Transport Assessment ED011, with two specific schemes identified. Further iterations of the IDP will also consider this issue, as well as the site allocation specific requirements which could necessitate transport assessments & travel plans being undertaken. ED005 Rural Topic Paper reviews current public transport provision in these areas.	No change required	NULLP631	Cross Heath, Wolstanton & May Bank Branch Labour Party (R Gorton)
A statement should be included (under the accessibility heading) that discourages developers from seeking to secure a reduction in the number of car spaces reserved for people with disabilities post the granting of permission.	Noted. Appendix 3: Parking Standards includes a section that deals explicitly with the provision requirements for disabled motorists. Variations from this would need to be justified robustly and subject to rigorous assessment as stated in para 3.5 of Appendix 3	No change required	NULLP631	Cross Heath, Wolstanton & May Bank Branch Labour Party (R Gorton)

The policy is supported, and it is acknowledged that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans. The focus given to developments that facilitate sustainable movement of freight traffic are also appreciated.	Noted	No change required	NULLP1283	National Highways (D Pyner)
National Highways is committed to working with the council to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with.	Noted. The Council will endeavour to continue & build upon the engagement to date with National Highways in collating future iterations of the infrastructure evidence base.	No change required	NULLP1283	National Highways (D Pyner)

46. Policy IN3 Access and Parking

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Proposed modification to the effect that the practice of including private or unadopted roads in development proposals will be discouraged, owing to what is considered the longer-term inconvenience it causes to residents once a scheme has been completed	Noted. Staffordshire County Council in their role as highways authority will consider adoption of roads under Section 38 of the Highways Act.	No change required	NULLP632	Cross Heath, Wolstanton & May Bank Branch Labour Party (R Gorton)
General concern at the scale of impact that the proposals will have on communities & the environment, particularly in Audley, Wood Lane & Bignall End	Noted. Policy PSD2 Settlement Hierarchy has sought to identify and group together settlements including to the level of services they contain, with ED005 Rural Topic Paper presenting more detail on the role & function of Rural Service Centres, including Audley	No change required	NULLP460	L Owen
Current congestion issues on the existing local road network including with lorries when accidents occur on the A500. Issues of road safety concerns, double parking, parking on pavements & insufficient parking at schools. Further development it is suggested will exacerbate these difficulties.	A Strategic Transport Assessment (ED011) has been prepared to consider the allocations in the Plan and identify any mitigation measures required.	No change required	NULLP460	L Owen

47. Policy IN4 Cycleways, Bridleways and Public Rights of Way

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Suggested addition of the word 'horse' to the phrase 'walking, cycling & riding' for clarity to subsection/criteria/point 1.	The value of making the suggested change for clarity is recognised by the Council.	1...walking, cycling and <u>horse</u> riding...	NULLP267	The British Horse Society
Any plans to increase cycling provision should take place separately to equestrian routes, or ensure the bridleway is given sufficient width. Consideration should also be made to specific factors such as surfacing, safety (including legal requirements) & useability for equestrian & carriage drivers, and their interactions with other means of active travel.	Noted. The opportunities that may be afforded by such separate or multi-user routes will be evaluated in future iterations of the Infrastructure Delivery Plan (with due regard to relevant documents including the Local Transport Plan) and should also be viewed in the context of the wider active travel ambitions detailed in various parts of the Local Plan. 1. of IN4 (including the suggested modification) provides a direct reference to horse riding, so it will where appropriate form part of wider deliberations on planning applications also.	No change required	NULLP267	The British Horse Society
Considered that aspects of the policy as drafted presents significant leeway to developers,	The Supporting Information to IN4 presents the legal	No change required	NULLP633	Cross Heath, Wolstanton & May Bank Branch Labour Party (R Gorton)

and the term 'normally' should therefore be removed from subsection/criteria/point 1c to provide more conviction of intent.	position re: rights of ways, and the approach highlighted in the Policy itself reflects this accordingly. The importance of developer engagement with Staffordshire County Council in its role as highways authority is also emphasised in the Supporting Information.			
Cycle and walkways should connect with the main pedestrian crossing points to promote safety. Examples exist currently in the borough where this is not the case, & these are requiring cyclists & pedestrians to cross busy main roads.	Noted. Aspects including connectivity, ease of movement and the negative impacts of poorly integrated routes on those who use the active travel networks are emphasised in the Policy and Supporting Information.	No change required	NULLP633	Cross Heath, Wolstanton & May Bank Branch Labour Party (R Gorton)
The creation of both cycle ways & rights of way paths is commendable. Related to this, where any suspensions of rights of way have taken place, these should be fully and properly restored once development has taken place. Adequate resources to their upkeep & routine maintenance should also be provided, and it ensured that those routes that are approved with the granting of planning permission	Noted. Staffordshire County Council in its role as highways authority is emphasised within the Policy and Supporting Information. The Council also acknowledges the importance & value of long-term maintenance of rights of way, as well as, where appropriate, ensuring their	No change required	NULLP1272	Thistleberry Residents Association (A Drakakis-Smith)

are fully implemented. Wider issues of prospective users of such routes having difficulties in being able to reach them in the first place through, for example, a lack of public transport is also highlighted.	implementation. The creation & enhancement of networks will, it is hoped, serve to alleviate some of the issues associated with any wider accessibility challenges.			
This policy is welcomed and note that it aligns with the expectations set out in the NPPF and National Highways' Net Zero Strategy.	Noted	No change required	NULLP1284	National Highways (D Pyner)
Inclusion of this policy, which seeks to maintain and enhance the network of public rights of way that cross the borough, is welcomed. Reference to the SA and specifically it being noted that the borough has relatively poor accessibility to the cycle network, a low performance for walking zones, as well as eight allocated sites not currently having safe pedestrian or cycle access adjacent.	As noted in table 6 of the Local Plan (page 108), developers will be required to establish and enhance connections to footpaths, cycleways, Public Rights of Way, and wider networks	No change required	NULLP1331	Natural England (S McLaughlin)

48. Policy IN5 Provision of Community Facilities

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Support for the provision of sufficient, quality community facilities, but it is considered that the proposed policy approach is not positively prepared or effective in its current form. Any loss or change of use of community facilities & assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. A suggested modification is proposed accordingly to the policy (sub-section b, primarily) to reflect these sentiments and address the soundness concerns.	Noted. IN5 and its Supporting Information, in line with national planning policy, places great weight in guarding against the unnecessary loss of valued services & facilities. For clarity, a modification will be made to refer to the operational requirements of a provider to set the context to the determination of need or demand for the facility.	To amend as follows: - 1b...with due regard to aspects including the operational requirements of the provider.	NULLP893	NHS Property Services (D Fleet)
The policy appears only to cover the retention of areas & facilities already in place and what is required should these be removed through development. It fails to recognise the need for new community facilities to support development where no existing provision is in place, or where there is no feasible opportunity to develop facilities available currently. This is considered significant in rural areas where even if facilities do exist, they were never intended to meet the level of	Community infrastructure is highlighted as part of Policy IN1. Such facilities are also considered within the Infrastructure Delivery Plan, and future iterations of this document will as well have regard to any emerging demands that may require new or expanded community facilities, recognising that there may also be	No change required	NULLP1176	Loggerheads Parish Council (J Love)

demand from a much larger population.	other competing infrastructure pressures, dependent upon the local circumstances & deliverability of the site.			
There is no direct reference that developers should (through s106 or other obligations) be expected to contribute to the development of community facilities required as a result of the increased population arising from their development. A proposed modification is suggested to address this, including the need to ensure investment & potentially the setting aside of land.	Noted. A non-exhaustive list of types of infrastructure that may be subject to direct provision and/or financial contributions is included in 5. of IN1. Whilst community facilities are not in their wider sense listed, the Supporting Information (para 10.5) to IN1 states that the Council is open to pre-application discussions as to the nature and extent of contributions made. Variations in priority dependent upon the area, existing capacity & locally specific priorities are also acknowledged in the text. The latest version of the IDP & the Government's stance on planning obligations at the time of an application will be	No change required	NULLP1176	Loggerheads Parish Council (J Love)

	significant determinants in approach also			
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49. Policy IN6 Telecommunications Development

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Suggested modification to sub-section 1e of the policy to refer to a heritage asset and its setting.	Noted and agreed	Text proposed to be supplemented, as follows: - e. the apparatus would not harm the significance of a designated heritage assets <u>including its setting</u>	NULLP520	Historic England (K Taylerson)

50. Policy IN7 Utilities

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Direct reference should be made in the policy to ensure that no harm occurs to the significance of heritage assets & their setting. Harm should also be avoided to archaeological remains wherever underground works are undertaken. Additional text to this effect within the supporting information section re: the placement of utilities infrastructure, may be useful.	Amended text is proposed to be made to criterion 4 of policy IN7 in response to the issues raised.	Text proposed to be amended as follows: - 4. “Within sensitive areas such as Conservation Areas <u>near heritage assets and their settings, new utility services should not harm the significance of the heritage asset.</u> New utility services should be laid....”	NULLP521	Historic England (K Taylerson)
Suggested modification to sub section/criterion 1 to add text stating the coordination of timings for infrastructure and development delivery may be necessary.	Noted. The Council considers this issue is adequately addressed by the provisions of 2. in Policy IN7.	No change required	NULLP791	United Utilities (A Leyssens)
This issue is not considered a land use planning matter, as it is managed under a separate statutory regime e.g. s37 (water) & s94 (sewerage) of the Water Industry Act 1991. Applicants should not have to assess or demonstrate the capacity of the water company to connect a development with water services.	Noted. Whilst acknowledging the statutory regime highlighted, the Council nonetheless considers that early & meaningful dialogue with infrastructure providers allied to the production of a utilities masterplan (both of which are advocated in Policy IN7) will alleviate such concerns.		NULLP859	Home Builders Federation (R Danemann)

51. Sustainable Environment

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
<p>Raise several overarching concerns relating to Green Belt and countryside development, the five-year housing land supply, and town centre uplift. Specifically:</p> <p>Green Belt/Countryside Development: Express concern that some local authorities might over-develop to avoid government intervention, leading to Green Belt encroachment. Raise the issue of land alienated by HS2 and its potential for development.</p> <p>Five-Year Housing Land Supply: Question whether over-development is driven by the need to meet the five-year housing land supply requirement.</p> <p>Town Centre Uplift: Note the decline of the Stones Market despite repeated attempts at "improvement" and questions whether this aligns with Newcastle-under-Lyme's identity as a "Market Town." Also point out that Newcastle-under-Lyme has only recently embraced its identity as a "University Town" despite having a university presence for 75 years.</p>	<p>The Council thanks the Thistleberry Residents Association for their comments regarding sustainable development within the borough. The Council recognises the importance of balancing development needs with the protection of the Green Belt and countryside, ensuring that new development is sustainable and respects the character of our communities. The Local Plan prioritises the use of brownfield land and seeks to minimise Green Belt release, only considering it in exceptional circumstances where all other options have been exhausted. This is reflected in policies PSD4 (Development Boundaries and the Open Countryside) and PSD5 (Green Belt), which establish clear restrictions on development outside designated settlement boundaries and within the Green Belt. The Council is committed to meeting its housing needs in a sustainable way and will continue to monitor the five-year housing land supply, as set out in Policy PSD1 (Overall Development Strategy) and the supporting text related to housing trajectory (Appendix 6). The Council will consider the delivery of future regeneration and investment in town centres and its strategy for the Stones Market in line with policies PSD2 (Settlement Hierarchy) and RET4 (Newcastle-under-Lyme Town Centre). The Council recognises the important role that Keele University plays in the borough's economy and community, and the emerging Local Plan supports its continued</p>	<p>No changes required.</p>	<p>NULLP1268</p>	<p>Thistleberry Residents Association</p>

	growth and development, as outlined in Policy PSD2 (Settlement Hierarchy) and SO10 (Strategic Objective 10). No changes to the policy are proposed.			
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52. Policy SE1 Pollution and Air Quality

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Objects to the inclusion of sites AB2 or AB2A due to adverse impacts on light, noise, and air quality. States the policy is neither legally compliant, sound, nor compliant with the Duty to Cooperate. Requests not to dilute comments in officer reports.	The Council acknowledges Audley Parish Council's concerns regarding the potential impact of sites AB2 and AB2A on light, noise, and air quality. The Council will ensure that all environmental impacts, including air quality, are carefully assessed as part of the planning application process for these sites, in accordance with Policy SE1. The final decision on their inclusion will be made in accordance with national policy and guidance, considering all relevant considerations. The Council notes the Parish Council's assertion that the policy is not legally compliant, sound, or compliant with the Duty to Cooperate. However, without specific justification for these assertions, the Council maintains that the policy is compliant with all necessary legal and procedural requirements.	No changes required.	NULLP496	Audley Parish Council
Objects to the introduction of sites AB2 and/or AB2A due to adverse impacts on light, noise, and air quality, recommending their removal from the Local Plan.	The Council acknowledges Mr. Bland's concerns regarding the potential impacts of sites AB2 and AB2A. As noted in the response to Audley Parish Council (NULLP496), these impacts will be carefully assessed as part of the planning application process for those sites, in line with Policy SE1. The final decision regarding these sites will be based on a comprehensive assessment of all relevant factors, including environmental considerations.	No changes required.	NULLP370	S Bland
Requests that criterion g be amended to clarify that a range of impact assessments may be required, placing responsibility on the developer to assess and mitigate impacts, with methods agreed in writing with the local	The Council thanks United Utilities for their suggested amendments to criterion g and the explanatory text of Policy SE1. Whilst the Council acknowledges the suggested changes, it believes the current wording is sufficient and adequately	No changes required.	NULLP792	United Utilities

planning authority and in consultation with the affected business. Also suggests expanding explanatory text to include that the approach to impact assessments must be agreed in writing and in consultation.	covers the issues raised. Policy SE1 focuses primarily on air quality, which is a material consideration in all developments. Other aspects of amenity, such as noise, odour, and vibration, are also material considerations within the broader context of the Local Plan and are specifically addressed in Policy SE12: Amenity. This ensures potential amenity impacts are considered throughout the development management process. The Council is confident that existing policy and supporting text adequately address the need for appropriate impact assessments and collaboration with affected businesses, without requiring specific amendments at this stage. Therefore, no changes will be made to the policy at this time.			
Objects to AB2 or AB2A due to adverse impacts.	The Council acknowledges the ARNP Steering Group's reiteration of concerns regarding the potential impacts of sites AB2 and AB2A. These concerns have already been noted in the response to Audley Parish Council (NULLP496) and will be considered.	No changes required.	NULLP397	Audley Rural Neighbourhood Plan Steering Group
Expresses concern over air quality in parts of Wolstanton, Porthill, and May Bank. Suggests strengthening the policy by removing "significant" from the phrase "significant adverse effects," arguing for clean air for all residents. Supports the emphasis on encouraging clean, green development. Notes the omission of a Bus Gate along Basford Bank and expresses support for this omission. Suggests deleting "significant" from the policy wording.	The Council acknowledges the concerns raised regarding air quality and supports the goal of clean air for all residents. The Council is committed to encouraging sustainable development that minimises pollution and improves air quality, as set out in Policy SE1, and notes the concerns around a proposed Bus Gate along Basford Bank. The Council believes that the current wording of the policy, which seeks to mitigate "significant adverse effects," allows for a proportionate and balanced approach. This ensures development can proceed where mitigation is provided to address major air quality impacts.	No changes required.	NULLP634	Cross Heath, Wolstanton and May Bank Branch Labour Party

Comments relate to the potential impact of the Marsh Parade development (Policy TC22) on The Rigger music venue. These concerns are more appropriately addressed in the comments section for Policy TC22.	The Council acknowledges The Music Venue Trust's comments regarding the potential impact of the Marsh Parade development on The Rigger music venue. As these comments relate specifically to Policy TC22, they will be addressed in the response to that policy.	No changes required.	NULLP1205	Music Venue Trust
Raises concerns about air quality and the plan's potential impact on designated sites. Notes the HRA's reliance on yet-to-be-undertaken traffic modelling and the Sustainability Appraisal's acknowledgement of a potential reduction in air quality. Expresses surprise at the projected decrease in traffic and pollution, particularly given the proposed lorry park and potential M6/A500 congestion. Recommends including ammonia from traffic emissions in the HRA. Further work is requested for the HRA and Natural England offer to engage with the LPA on an SoCG.	The Council acknowledges Natural England's concerns regarding the potential impact of the Local Plan on air quality, particularly in relation to designated sites. The Council notes the outstanding traffic modelling work and is currently preparing further work, in response to the comments from Natural England. The Council welcomes Natural England's offer to engage on a Statement of Common Ground and will liaise with them to ensure the plan adequately addresses all potential impacts on air quality and designated sites, in accordance with Policy SE1 and the relevant legislation.	No changes required	NULLP1326	Natural England

53. Policy SE2 Land Contamination

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Supports the policy's requirement for a Coal Mining Risk Assessment to support development proposals in areas where past coal mining activity may pose a risk. Requests amending the wording from "referral area" to "Development High Risk Area" for consistency with published guidance.	The Council thanks the Coal Authority for their support of Policy SE2 and acknowledges their suggestion to amend the wording from "referral area" to "Development High Risk Area." While the Council appreciates the Coal Authority's desire for consistency with their published guidance, we believe the current policy wording, using "Coal Mining Referral Area", is clear and unambiguous in its meaning, and doesn't cause confusion. The policy clearly states the requirement for a Coal Mining Risk Assessment in areas where past coal mining activity poses a risk, which aligns with the Coal Authority's core objective of ensuring safe development. Therefore, no changes to the policy wording are proposed at this stage. The Council is committed to ensuring clear communication with developers and can provide further clarification within future supporting guidance or other advice documents if needed, referencing The Coal Authority's use of the term "Development High Risk Area" in their publications. This will ensure the Local Plan focuses on relevant policy considerations while also directing users to additional information that is helpful.	No changes required.	NULLP329	The Coal Authority
Welcomes the inclusion of Policy SE2 and its requirement for risk assessment, remediation, and long-term monitoring supported by financial provisions.	The Council thanks the Environment Agency for their support of Policy SE2. The requirements for risk assessment, remediation, and long-term monitoring, supported by financial provisions, are considered essential for ensuring that	No changes required.	NULLP1366	Environment Agency

	development on potentially contaminated land is safe and sustainable, in accordance with Policy SE2. These measures protect both the environment and human health, aligning with the key aims of the policy.			
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54. Policy SE3 Flood Risk Management

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Suggests updating criterion 1 to reflect that new flood risk information may become available during the plan period, proposing the following amended wording: "1. All development should follow the sequential approach to determining the suitability of land for development, direct new development to areas at lowest risk of flooding and where necessary apply the exception test, taking account of all sources of flooding identified in the Strategic Flood Risk Assessment."	The Council thanks United Utilities for their suggested amendment to criterion 1 of Policy SE3. While the Council appreciates the suggestion to include the phrase "taking account of all sources of flooding identified in the Strategic Flood Risk Assessment," we believe the existing wording of criterion 1 is sufficient. The policy already requires developments to follow the sequential approach and directs new development to areas at the lowest risk of flooding. The Strategic Flood Risk Assessment (SFRA) forms part of the evidence base and informs this policy decision-making process and is regularly reviewed to incorporate up-to-date information including from storm events and new modelling data. For further details, please see the SFRA and supporting evidence base which contains detailed information on flood risk, flood zones, critical drainage areas, and appropriate mitigation measures. No changes to the policy wording are proposed at this time.	No changes required.	NULLP793	United Utilities
Recommends an SFRA update to support site selection.	The Council acknowledges the Environment Agency's recommendation for an SFRA update. The Council is preparing some additional information following the request by the Environment Agency	No changes required.	NULLP1353	Environment Agency
States the policy should have more regard to and focus on specific local flood risk requirements linked to the SFRA. Notes sections 1-3 largely duplicate existing national policy/guidance (NPPF and NPPG) and could be more concise with relevant signposting.	The Council acknowledges the Environment Agency's detailed comments on Policy SE3. Some additional text is proposed to be added to sections 3 and the supporting text.	Section 3, "e. Include detailed modelling of any ordinary watercourse, main river and	NULLP1361	Environment Agency

<p>Questions wording of 3(b), notes potential omission in 3(e). Recommends including modelling or assessment of functional floodplain (zone 3b) for all rivers. Finds Section 4 wording poor/lacking clarity, questions meaning of "high risk areas", questions specific minimum floor levels (4a), and notes 8m easement (4b) is required regardless. Recommends including River Basin Management Plans in 4(c). Recommends an SFRA update to support site selection.</p>		<p><u>/ or functional floodplain</u> within or adjacent to the site, where appropriate....” Section 4, additional text added to paragraph 11.10, as follows: -</p> <p><u>For the purposes of this policy, 'high-risk areas' are defined as:</u> <u>-Land located within Flood Zones 2, 3a, or 3b.</u> <u>-Sites 1 hectare or greater located within Flood Zone 1 where the current SFRA identifies a risk of flooding from any source.</u> <u>-Areas designated as Critical</u></p>		
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		<p><u>Drainage Areas (CDAs) in the current SFRA.</u></p> <p><u>-Areas where the current SFRA identifies that development would increase flood risk or exacerbate existing flooding, particularly in those catchments identified as 'highly sensitive' to cumulative impact, which includes the following watercourses: Lyme Brook, Fowlea Brook, Valley Brook, and Englesea Brook.</u></p> <p><u>-Areas identified as being susceptible to groundwater flooding,</u></p>		
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		<p><u>including those within Source Protection Zones (SPZs) 1,2, or 3.</u></p> <p><u>-Areas identified on the current SFRA Groundwater Emergence map where groundwater levels are between 0 and 0.5m below ground level."</u></p> <p>Section 4, additional text added to paragraph 11.12, as follows: -</p> <p><u>"The SFRA has given due consideration to the requirements and objectives of River Basin Management Plans (e.g. the Humber and</u></p>		
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		<u>North West River Basin Management Plans) when assessing flood risk and where relevant, FRAs should also have regard to River Basin Management Plans, as appropriate”.</u>		
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55. Policy SE4 Sustainable Drainage Systems

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Thanks the Council for noting that canals offer a surface water disposal option and for highlighting the need for consent. Requests a correction to its name in part 4 of the policy and paragraph 11.21 of the explanatory text (from "Canal and Rivers Trusts" to "Canal & River Trust").	The Council thanks the Canal & River Trust for their comment and confirms that the requested correction to their name will be made in both Part 4 of the policy and paragraph 11.67 of the supporting text. This minor administrative amendment ensures accuracy throughout the Local Plan and will now be actioned.	Amend spelling in line with request.	NULLP200	Canal and River Trust
Requests several amendments to Policy SE4. These include expanding point 1 to clarify exemptions for smaller developments, revising point 2 to add detail to the surface water hierarchy, adding a new point 3 requiring a foul and surface water SuDS drainage strategy (with detailed requirements for the strategy), and adding new points 4, 5, 6, and 7 regarding engagement with relevant authorities, integration with landscaping, maintenance plans, and minimising pumped drainage systems. Provides suggested wording for the revised policy.	The Council thanks United Utilities for their comprehensive suggested amendments to Policy SE4. Whilst the Council acknowledges the detailed suggestions provided, we believe the existing policy wording, in conjunction with the supporting guidance and the technical documents referenced within the policy (such as the SFRA, LLFA guidance, and relevant SuDS design standards), adequately addresses the key principles of sustainable drainage. The policy clearly establishes a hierarchical approach to surface water management, prioritising infiltration and promoting sustainable drainage techniques. It also requires a SuDS drainage strategy to be submitted with planning applications, ensuring a thorough assessment of site-specific conditions and the proposed SuDS design. For further information, see the National Planning Policy Framework, the Strategic Flood Risk Assessment (SFRA) and other supporting technical documents, which provide detailed guidance on sustainable drainage systems and their implementation. The Council is confident that the current policy effectively promotes	No changes required.	NULLP794	United Utilities

	sustainable drainage practices while allowing for flexibility to address site-specific constraints, and that the proposed amendments are not essential for the policy's soundness or effectiveness. Therefore, no changes to the policy wording are proposed at this stage.			
Welcomes the statement that the Council will work with developers to provide/enhance open spaces. Believes Local Plan adoption is an effective way to protect open space. Suggests strengthening Policy SE1 and adding a modification related to Bus Gates along Basford Bank.	The Council thanks the Cross Heath, Wolstanton and May Bank Branch Labour Party for their comment. While appreciating their support for open space protection, the points raised regarding strengthening Policy SE1 and Bus Gates along Basford Bank are not directly relevant to Policy SE4: Sustainable Drainage Systems and will be addressed under the relevant policy sections.	No changes required.	NULLP635	Cross Heath, Wolstanton and May Bank Branch Labour Party
Notes that SuDS often lack water treatment features when discharging to a watercourse, with developers arguing treatment is unnecessary when discharging to a sewer. The County Council points out that sewers eventually discharge to watercourses, so treatment is a key requirement. Recommends prioritising above-ground SuDS features (swales, basins) to boost treatment, amenity, and biodiversity. Suggests rewording point 3(b).	The Council acknowledges Staffordshire County Council's concerns regarding the lack of water treatment features in SuDS proposals. The Council encourages, but doesn't mandate, the use of above ground SuDS features where appropriate, recognising their potential multi-functional benefits, as stated in Policy SE4 and the supporting technical guidance. This offers sufficient flexibility whilst ensuring the policy doesn't enforce solutions that may be unsuitable or unviable in certain situations. Therefore, no changes to the policy wording are proposed at this stage.	No changes required.	NULLP1070	Staffordshire County Council
Similar to Staffordshire County Council, highlights the lack of water treatment features in SuDS submitted with planning applications. Recommends prioritising above-ground SuDS features (swales, basins) for water treatment, amenity, and biodiversity. Suggests re-wording to point 3(b).	The Council acknowledges Natural England's comments regarding SuDS and water treatment. As stated in our response to comment NULLP1070, the existing policy encourages, but doesn't mandate, the inclusion of water treatment features, providing sufficient flexibility based on site-specific conditions. The Council will continue to promote best practice in SuDS design and	No changes required.	NULLP1328	Natural England

	implementation through the supporting guidance documents referenced within Policy SE4.			
Questions what constitutes "smaller developments" in criterion 1, suggesting aligning it with "minor sites" in the NPPF. Also raises concerns about viability implications of requiring SuDS for all developments and whether viability testing has been undertaken.	The Council acknowledges WMHAPC's query regarding the definition of "smaller developments" and confirms that this relates to developments of less than 10 dwellings or 0.5ha, as defined in the National Planning Policy Framework (NPPF). This aligns the policy with national guidance, providing clarity and consistency. The Council also confirms that the requirement for SuDS has been tested and deemed viable through the Local Plan viability assessment, demonstrating deliverability, and avoiding unreasonable burdens on development.	No changes required.	NULLP1064	West Midlands Housing Association Planning Consortium
Supports the paragraph referencing heritage and SuDS. Suggests adding that only appropriate SuDS should be accepted, and harm to heritage assets and their setting should be fully considered and avoided. Notes potential downstream impacts on heritage assets (e.g., waterlogged archaeology) and suggests including this in the policy text, not just supporting information.	The Council thanks Historic England for their support of the paragraph referencing heritage and SuDS. The suggested amendments to explicitly include the avoidance of harm to heritage assets and their settings, and consideration of potential downstream impacts, are already addressed within Policy SE9 (Historic Environment), which sets out the overarching requirements for protecting the historic environment. Therefore, no specific amendments are required to Policy SE4 at this stage	No changes required.	NULLP522	Historic England

56. Policy SE5 Water Resources and Water Quality

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Refers to a previous request for a Water Cycle Study (WCS) update. Notes the July 2024 WCS update and provides comments based on a high-level review. States they cannot make a detailed assessment yet but notes the headroom assessment identified Wastewater Treatment Works (WwTW) with limited treatment capacity. Suggests consulting with Severn Trent Water and United Utilities regarding WwTW capacity. Acknowledges the Water Quality assessment, which considers increased effluent discharge from WwTWs due to development. Notes that a new/variation to the Environmental Permit (EP) may be required for the WwTW to prevent deterioration of water quality, which the WCS has considered. No specific policy changes suggested.	The Council acknowledges the Environment Agency's comments regarding the Water Cycle Study (WCS) update. The Council confirms that Policy SE5 and its supporting text are informed by the July 2024 WCS update and consider the identified wastewater treatment works (WwTW) capacity constraints and planned upgrades. The Council will continue to liaise with Severn Trent Water and United Utilities, as advised, to ensure that provision of WwTW capacity aligns with the delivery of development and will consider the potential need for new/variations to Environmental Permits (EPs) to prevent deterioration of water quality, as highlighted in the WCS and in accordance with Policy SE5. The Council maintains that the current evidence base, including the WCS, sufficiently demonstrates the deliverability of development proposals in the context of wastewater infrastructure capacity. For further information, please see the Water Cycle Study (2024).	No changes required.	NULLP1383	Environment Agency
Notes Section 3 advises that residential developments should be designed to achieve a maximum of 110 litres per person per day, but this doesn't reflect the WCS recommendations, which suggest a 100l/p/d standard. Notes the government's Environmental Improvement Plan commits to considering a new standard of 105l/p/d (100l/p/d where local need exists). Recommends the policy allow for a future	The Council acknowledges the Environment Agency's comments regarding the water efficiency standard proposed in Policy SE5. Whilst the Council notes the recommendations within the Water Cycle Study (WCS) and the government's Environmental Improvement Plan regarding potential future standards, we believe that the current standard of 110 litres per person per day, as set out in Building Regulations Part G, is appropriate for the plan period. This approach	No changes required.	NULLP1381	Environment Agency

reduction in the water efficiency target and suggests updating the policy to reflect a tighter water efficiency standard.	offers flexibility and provides a reasonable allowance for water use in new developments. It's important that the plan is up to date and in line with current legislation and that any changes are made in relation to an adopted version of the legislation, rather than a draft. As such the policy will be retained as is.			
Welcomes Policy SE5 for addressing some of their early points but suggests the policy go further and include a section on non-mains foul drainage, requiring adherence to the drainage hierarchy and an assessment of water quality impacts. Also, notes the supporting text lacks signposting to relevant catchment data (WFD), which should be included.	Noted	Note the comment on non-mains foul drainage and proposed the following text, as an additional policy criterion: - <u>“7. Development should follow the hierarchy (order of preference for foul drainage connection), as set out in National Planning 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”.</u>	NULLP1386	Environment Agency

		<p>Note the comment re signposting, additional text added to paragraph 11.23, as follows: -</p> <p><u>“11. 23....Relevant development proposals should have regard to Water Framework Directive catchment areas (in the North West / Humber catchment) and also River Basin Management Plans”.</u></p>		
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57. Policy SE6 Open Space, Sports, and Leisure Provision

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
These two comments appear to relate to a proposal for an Astro-Pitch in Silverdale Park, opposite the Post Office. Mr. Surdhar requests planning permission for the facility, suggesting potential uses by schools, colleges, universities, and clubs. He references the involvement of a gold medallist from the 1988 Seoul Olympics and a player from Stone Hockey Club. He wishes to discuss future developments in Silverdale, including housing and business development, and raise these matters with the Council and relevant authorities.	The Council acknowledges Mr. Surdhar's comments regarding the proposed Astro-Pitch in Silverdale Park. While the Council supports the provision of new sports and leisure facilities, as outlined in Policy SE6, these comments are more appropriate for consideration as part of a planning application or pre-application discussion, rather than as feedback on the policy itself. Mr. Surdhar is encouraged to contact the Council's planning department to discuss his proposals in more detail and obtain advice on the planning application process. The information regarding existing and proposed developments and/or services outside of the plan area will not be considered as it is outside the scope of the Local Plan.	No changes required.	NULLP35	RS Surdhar
			NULLP145	RS Surdhar
Objects to Policy SE6, point 4, arguing it is inconsistent with NPPF paragraph 103(a) because it doesn't allow for the loss of existing open space after an assessment showing it to be surplus to requirements. Suggests aligning the policy with NPPF 103(a) and removing supporting text at paragraph 11.33.	The Council acknowledges Sport England's concerns regarding Policy SE6, point 4, and its consistency with NPPF paragraph 103(a). The Council maintains that the current policy wording is consistent with the NPPF and allows for consideration of the loss of existing open space, sports and recreational buildings and land, including playing fields, where this is demonstrably surplus to requirements through the submission of appropriate evidence as set out in paragraph 11.33 of the supporting text. The Council believes the policy as written offers sufficient flexibility to consider the loss of such sites/facilities while safeguarding their important contribution.	No changes required.	NULLP221	Sport England

Notes equestrians have limited access to rights of way and often use roads. Provides statistics on road incidents involving horses. Emphasises the importance of planning policies protecting and enhancing public rights of way and access (NPPF, s104). Suggests acknowledging the contribution of equestrian activities to the economy and supporting the equine industry through consideration of equestrian access in open space and green infrastructure planning (Policies SE6 and SE14).	The Council acknowledges The British Horse Society's comments and recognises the importance of equestrian access and its contribution to both the local economy and recreational opportunities. The Council supports the aims outlined in the NPPF, promoting the protection and enhancement of public rights of way. Opportunities for improving equestrian access will be explored through the green infrastructure network, as promoted by Policies SE6 and SE14 (Green and Blue Infrastructure), and existing provisions within these policies are considered adequate at this stage.	No changes required.	NULLP268	The British Horse Society
Supports Policy SE6 and notes the clarification provided since Regulation 18 regarding contribution calculations (criteria 2). Refers to supporting representation for allocation SP23, mentioning the delivery of open space and green infrastructure at this location.	The Council acknowledges Richborough Estates' support for Policy SE6 and notes their reference to the delivery of open space and green infrastructure at the SP23 allocation. The Council supports the provision of high-quality green infrastructure as part of new development and existing policy is considered to facilitate this.	No changes required.	NULLP732	Richborough Estates
Suggests excluding 100% affordable housing schemes from off-site sports and leisure contribution requirements in Policy SE4 due to viability concerns. Also suggests re-wording Policy SE6, criterion 3, to allow for more flexibility in on-site open space provision, as Biodiversity Net Gain (BNG) requirements may necessitate specific habitat provision over traditional greenspace.	The Council acknowledges Aspire Housing's comments regarding the calculation of contributions and the potential implications of BNG on the delivery of open space, as referred to in Policy SE6. The Council believes that the policy wording provides sufficient flexibility to address these considerations on a site-by-site basis. The Council is supportive of the protection of open space and the development of affordable housing within the borough.	No changes required.	NULLP883	Aspire Housing
Supports the general principles of Policy SE6 but notes it doesn't recognise the loss of open space required for a junction improvement at Newcastle Road/Coalpit Hill. Suggests adding a new criterion 4(d) to allow for open space loss	The Council acknowledges Staffordshire County Council's feedback concerning the loss of open space required for the junction improvement at Newcastle Road/Coalpit Hill. Whilst recognising the importance of the proposed highway improvement	No changes required.	NULLP1095	Staffordshire County Council

for "infrastructure schemes identified in the IDP."	scheme, the Council maintains that Policy SE6 appropriately protects open space and allows for its loss only in specific circumstances, as outlined in criterion 4 of the policy. The inclusion of the suggested amendment (criterion 4(d)) is not considered necessary, as the policy already allows for such proposals through a comprehensive assessment of infrastructure requirements and the benefits of the scheme versus the loss of open space. The Council believes the policy is sufficiently robust in its current form and adequately balances these competing interests.			
Supports Policy SE6 and notes its clarification regarding contributions. Refers to supporting representation for allocation TB19, where open space and green infrastructure could be delivered.	The Council acknowledges Richborough Estates' representation regarding Policy SE6 and the "Open Space Strategy Sites" designation. The Council maintains that this designation, informed by the Open Space and Green Infrastructure Strategy (2022), serves an important purpose in identifying and safeguarding key open spaces within the borough, contributing to the protection of valuable recreational areas and supporting the aims of Policy SE6. The Council believes the current designation is appropriate and justified.	No changes required.	NULLP744	Richborough Estates
Objects to the "Open Space Strategy Sites" designation on the Policies Map in relation to the University campus. Argues the designation is not directly referenced in written policies, is based on a strategic assessment (not intended for specific designations), has unclear policy application if applied to these areas, includes existing infrastructure that shouldn't be covered by the designation, and isn't justified given existing policy protections for open space around heritage assets. Recommends removing the designation from the Policies Map or, if	The Council acknowledges Keele University's concerns regarding the "Open Space Strategy Sites" designation on the Policies Map, specifically in relation to the University campus. The Council maintains that this designation, as informed by the Open Space and Green Infrastructure Strategy (2022) and reflected on the Policies Map, is a valuable tool for guiding development and ensuring the long-term protection and enhancement of open space within the Borough, in line with Policy SE6. The Council acknowledges the University's position as a significant local	No changes required.	NULLP812	Keele University

retained, defining it more specifically and not applying it to the Keele University campus.	institution and employer; however, the designation serves a wider strategic purpose in safeguarding open spaces across the borough, and the Council believes this approach is appropriate and justified. The specific concerns raised regarding the impact of the designation on the University campus and its future development aspirations will be given due consideration.			
Supports the site-by-site assessment approach for open space provision but suggests that proposed open space provisions demonstrate community support, not just reliance on strategies. Suggests stronger links to Policy SE7 (Biodiversity Net Gain).	The Council acknowledges WMHAPC's support for the site-by-site assessment approach for open space provision, as set out in Policy SE6. The existing policy wording encourages consideration of community support for proposed open space solutions through the submission of appropriate evidence. The Council believes that explicit demonstration of community support for proposed open space would be overly burdensome and could potentially hinder development and notes that further requirements in relation to the assessment of BNG requirements are addressed in Policy SE7: Biodiversity Net Gain.	No changes required.	NULLP1065	West Midlands Housing Association Planning Consortium
Notes the Playing Pitch Strategy (PPS) identifies the need for a new PPS focusing on football and cricket. Notes the commitment to a new PPS but highlights that it won't occur until 2025 despite the plan allocating sites that result in playing field loss. Recommends demonstrating a commitment to a new PPS by commissioning the work before 2025 with a clear timeframe, as per Sport England's PPS guidance.	The Council acknowledges Sport England's comments regarding the Playing Pitch Strategy (PPS) and the timing of its update. The current PPS (2019) and supporting evidence base sufficiently inform the open space and sports/playing pitch provision policies within the Local Plan, including Policy SE6, and any updates to the strategy will be reflected in future Local Plan reviews.	No changes required.	NULLP214	Sport England
Notes that the Policies Map doesn't identify all playing fields, with some current/former school playing fields omitted. Seeks clarity that Policy SE6 applies to all open space/playing field sites	The Council acknowledges Sport England's comments regarding the Policies Map and the identification of playing field sites. The Council confirms that Policy SE6 relates to all open space	No changes required.	NULLP219	Sport England

(including proposed allocations), not just those on the map, as it might be implied that omitted sites are surplus to requirements. Suggests clarifying that SE6 applies to all open space/playing fields, including proposed allocations.	and playing field sites, including those allocated for development in the plan, and not just those identified on the Policies Map, which is for illustration purposes and doesn't preclude allocation of other such sites where justified.			
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58. Policy SE7 Biodiversity Net Gain

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Gladman recognises the importance of biodiversity net gain (BNG) and suggests the Local Plan provide certainty for developers with a clear BNG policy and a fixed 10% figure, rather than "at least 10%." They also ask that the plan include a link to the Local Nature Recovery Strategy (LNRS) once prepared or include a reference to the timetable for its production. Request further clarity from the Council on the availability of habitat banking and biodiversity units in the borough.	The Council acknowledges Gladman's comments regarding Policy SE7 and their desire for greater certainty regarding the BNG requirement. The Council maintains that the current policy wording, requiring "at least a 10% measurable net gain," is consistent with the Environment Act 2021 and provides sufficient flexibility while encouraging developers to exceed the minimum requirement where feasible. Regarding the Local Nature Recovery Strategy (LNRS), the emerging Staffordshire LNRS and its timetable for production can be found online. Information on habitat banking and biodiversity units within the borough will also be published in due course. This information should provide Gladman Developments Ltd with additional clarity on BNG requirements and expectations within the Borough.	No changes required.	NULLP770	Gladman Developments Ltd
Considers Policy SE7 unsound because it doesn't fully reflect new legislation, national policy, and DLUHC/DEFRA guidance on Biodiversity Net Gain. HBF recommends the policy use a fixed 10% BNG figure, as per the Environment Act, rather than "at least 10%." They also note inaccuracies in the policy relating to BNG exemptions and the characterisation of the BNG hierarchy, suggesting revisions for accuracy. Note that the policy doesn't reflect the PPG guidance that for phased developments, 10% BNG should be	The Council acknowledges the Home Builders Federation's (HBF) concerns regarding Policy SE7. The Council maintains that the current policy wording aligns with the Environment Act 2021 and associated guidance, including the PPG and the DEFRA BNG Guidance. The policy establishes a clear framework for achieving BNG, requiring a minimum of 10%, and the Council is confident that this approach provides sufficient flexibility to consider the specifics of each development, such as phasing. The policy supports the statutory requirements for BNG, and the Council will	No changes required.	NULLP860 & NULLP861	Home Builders Federation

delivered at the end of the development (not necessarily on each phase).	consider any additional guidance issued by DLUHC and DEFRA as well as any requirements resulting from the LNRS and other updates as part of future reviews of the Local Plan.			
Seeks to ensure BNG delivery doesn't restrict key infrastructure operations, suggesting an additional criterion: "5. Consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change." This is based on PPG guidance stating BNG should be resilient to future pressures.	The Council acknowledges United Utilities' concern regarding the potential impact of BNG requirements on key operational infrastructure. The Council maintains that Policy SE7, in conjunction with other relevant policies such as Policy IN7 (Utilities), adequately balances the need for biodiversity net gain with the need to protect and maintain essential infrastructure. Development proposals will be assessed on a case-by-case basis to ensure that both biodiversity and infrastructure needs are appropriately considered.	No changes required.	NULLP795	United Utilities
Highlights duplication between Policy SE9 and national policy (criteria 2) regarding assessment of harm to designated heritage assets, suggesting parts 2 and 3 be made more concise. Also notes that for off-site BNG, national policy/the Environment Act doesn't require provision to be as close as possible to the development site. Also raises concerns about a specific policy interpretation regarding archaeology. Notes that the BNG hierarchy is on-site units, then off-site units, then statutory credits— <i>not</i> onsite, then onsite and offsite, then statutory credits.	The Council acknowledges Aspire Housing's comments regarding off-site BNG provision. The Council maintains that the current policy wording, which prioritises on-site BNG but allows for off-site provision where demonstrably necessary, strikes an appropriate balance. This tiered approach ensures that the benefits of BNG are realised locally where possible, while offering flexibility for developments facing site-specific constraints. Further details on BNG requirements are set out in national policy, and the Council will take these into consideration.	No changes required.	NULLP884	Aspire Housing
Supports the inclusion of a BNG policy. Suggests clarifying that BNG doesn't apply to irreplaceable habitats and that mitigation for Habitats sites is separate from BNG. Recommends setting out how BNG will be delivered/managed (including monitoring), with	The Council acknowledges Natural England's wide-ranging comments on the Local Plan. Regarding Policy SE7 specifically, the Council maintains that the policy is consistent with the Environment Act 2021 and NPPF requirements for BNG. The Council supports the principle of BNG and its potential to	The Council is proposing to add additional text at the end of the supporting text,	NULLP1332	Natural England

<p>specific indicators to demonstrate gains. Notes the SA's statement regarding potential cumulative impacts despite BNG provisions. Wants to understand the evidence base and options assessment informing site allocations. Will engage with the LPA to consider cumulative BMV loss and potential mitigation. Provides links for further assessment of air quality and BMV loss. Suggests adding additional objectives to SO-4 related to air quality, water quality/quantity, soils, and landscape. Suggests adding strategic objectives related to ecology/landscape and redundant housing/commercial building regeneration. Recommends policy changes relating to soils, green infrastructure, public rights of way, and water management, among others.</p>	<p>enhance the Borough's biodiversity and is working towards development of the Local Nature Recovery Strategy in accordance with the Environment Act. That being said, additional clarification is suggested to be added to the supporting text regarding irreplaceable habitats and mitigation measures.</p> <p>In respect of monitoring, indicator MF19 on page 176 refers to BNG requirements in line with statutory guidance.</p>	<p>paragraph 11.39, as follows (shown as bold and underlined)</p> <p>11.39.... more successful nature recovery network.</p> <p>“Biodiversity Net Gain is not applied to irreplaceable habitats. Any mitigation / compensation requirements for Habitats sites should be dealt with separately from Biodiversity Net Gain provision”.</p>		
<p>Welcomes the 10% BNG requirement. Suggests creating a BNG supplementary planning document and/or implementation notes/guidance to help developers understand the costs of mandatory BNG.</p>	<p>The Council acknowledges WMHAPC's support for the 10% BNG requirement in Policy SE7. The Council will consider the development of any supplementary planning guidance or other supporting documentation required to clarify BNG requirements, particularly relating to costs once the final version of the Local Nature Recovery Strategy (LNRS) is published in accordance with the requirements of the Environmental Act 2021.</p>	<p>No changes required.</p>	<p>NULLP1067</p>	<p>West Midlands Housing Association Planning Consortium</p>

59. Policy SE8 Biodiversity and Geodiversity

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Suggests adding supporting text to Policy SE8 explaining the availability of the Great Crested Newt District Licensing Scheme, for which the Council holds the licence. Provides suggested text explaining the scheme, which provides an alternative licensing option for developers to address impacts on Great Crested Newts via a conservation payment. Also provides a suggested definition of the District Licence Scheme for the Local Plan Glossary.	The Council acknowledges Naturespace Partnership's suggestion to include supporting text in Policy SE8 regarding the Great Crested Newt District Licensing Scheme. Whilst the Council recognises the value of this scheme, we believe the existing policy wording, which promotes the conservation and enhancement of biodiversity and geodiversity, is sufficiently broad to encompass all relevant considerations, including the District Licensing Scheme as an option for developers. Explicit mention within the policy is not considered necessary at this stage, as it could inadvertently create an impression of favouring one specific mitigation approach over others. Information on the Great Crested Newt District Licensing Scheme can be found online, and developers are encouraged to explore all available options for mitigating impacts on protected species. This information within the supporting documents also informs Policy SE7: Biodiversity Net Gain.	No changes required.	NULLP570	Naturespace Partnership
Suggests adding to Policy SE8 that swift bricks should be installed in all new developments (including extensions) in accordance with best-practice guidance (BS 42021 or CIEEM). Also suggests adding text regarding SE8/11.45 in a separate sub-section to avoid duplication.	The Council acknowledges the Swifts Local Network's suggestion regarding the inclusion of swift bricks in new developments. While the Council supports measures to enhance biodiversity within the built environment, as set out in Policies SE8 and SE11 (Trees, hedgerows, and woodland), a specific requirement for swift bricks in all developments is considered overly prescriptive and potentially unviable or unsuitable in certain situations. Developers are encouraged to	No changes required.	NULLP428	Swifts Local Network: Swifts & Planning Group
			NULLP437	Swifts Local Network: Swifts & Planning Group

	incorporate such features where appropriate and feasible, and the Council will continue to promote best practice through design guidance and other advice documents.			
Questions the use of the word “significant” in point 6 of Policy SE8, suggesting any development resulting in the loss or deterioration of irreplaceable habitats should be refused. Proposes amending the policy to reflect this.	The Council acknowledges the comment regarding the wording of point 6 in Policy SE8. The Council maintains that the current wording, which allows for consideration of exceptional circumstances where the benefits of development may outweigh the loss of irreplaceable habitats, is consistent with the NPPF. This approach allows for a balanced consideration of competing interests, recognising that in certain limited situations, the benefits of a development may outweigh the potential harm. The Council has considered the need to balance protecting nationally designated sites and the biodiversity they support whilst supporting sustainable development. For further information see the Habitats Regulations Assessment and supporting evidence base.	No changes required.	NULLP636	Cross Heath, Wolstanton and May Bank Branch Labour Party
A wide-ranging response covering various aspects of the Local Plan, including air quality, BMV agricultural land, Duty to Cooperate, vision and strategy, strategic objectives, and specific site allocations. Within the comments related to SE8, they welcome the policy and suggest improvements: clarifying that BNG doesn't apply to irreplaceable habitats, outlining how BNG will be delivered/managed, strengthening protection of designated sites, incorporating Natural England's suggested wording change ("conserved and enhanced"), requiring a project-level HRA for proposals impacting internationally designated sites, emphasising integration of green/blue	The Council acknowledges Natural England's wide-ranging comments on the Local Plan. Regarding Policy SE8, the Council appreciates the feedback and confirms that it supports the aims of the policy to protect and enhance biodiversity and geodiversity. The Council is working towards the development of a Local Nature Recovery Strategy, and this will further inform the implementation of Policy SE8, including its integration with the Nature Recovery Network. The specific details regarding BNG, air quality, water quality, strategic objectives, specific site allocations, soil management, and green infrastructure will be addressed under the relevant sections of the Local Plan. The Council is supportive of the points raised	No changes required.	NULLP1333	Natural England

infrastructure, collaborating with United Utilities, and ensuring consistency with the emerging Staffordshire Local Nature Recovery Strategy.	with regards to collaborative working with statutory bodies and organisations such as Staffordshire County Council and promoting connectivity by including green/blue infrastructure. The Council also confirms that it will provide additional information with regards to the implementation of policy SE8 following the formal adoption of the LNRS and any associated statutory assessments.			
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60. Policy SE9 Historic Environment

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Suggests recognising the role of neighbourhood plans in providing more locally specific heritage policies. Objects to the inclusion of AB2, citing adverse impacts.	The Council acknowledges Audley Parish Council's suggestion regarding the role of neighbourhood plans in providing more locally specific heritage policies. The Council confirms that 'made' Neighbourhood Plans are a material consideration in the determination of planning applications, and their heritage policies will be given due weight in accordance with the NPPF, providing a degree of local input as the Parish Council suggests. The Council supports local communities taking a more detailed approach to protecting local heritage and welcomes input from Neighbourhood Plans. For further details, see the NPPF and adopted Neighbourhood Plans within the Borough. The concerns raised with regards to site allocations will be considered as part of the site allocations review.	No changes required.	NULLP497	Audley Parish Council
Welcomes the inclusion of a specific policy for the historic environment. Suggests several improvements: breaking down Clause 1(a) into bullet points, adding links to specific urban/townscape heritage characterisation studies and Conservation Area Appraisals and Management Plans, clarifying the policy hierarchy in Clause 2, resisting development causing less than substantial harm, strengthening Clause 2(g), prohibiting demolition before development confirmation, adding detail to Clause 3(b), removing Clause 4(b) on enabling development (as it contradicts	The Council thanks Historic England for their detailed comments on Policy SE9. On clause 1(a) the Council considers that the wording of the criterion is appropriately framed. Clause 2, the following changes are proposed: - <u>2. Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Proposals that will lead to harm to....</u> Paragraph 11.49, the following text is proposed to be added to the introduction of the paragraph: - <u>The Council is committed to the protection and conservation of the Borough's heritage assets. In</u>	As shown in the adjacent column	NULLP523	Historic England

<p>policy), moving Clause 5 to the Shopfront and Advertisement Policy, adding a clause for archaeology (including assessment details), incorporating a local list of non-designated heritage assets (if one exists), addressing the assessment of setting (including views analysis), adding more detail to the text, and referencing applicable guidance.</p>	<p><u>determining planning applications that may affect heritage assets, the Council will apply a hierarchical approach. In the first instance, proposals that will cause harm to a heritage asset, or its setting, will be resisted."</u></p> <p>In the introduction to paragraph 11.51</p> <p><u>In line with the NPPF, any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. The starting point for considering proposals that may affect heritage assets should be to avoid harm altogether. Where harm cannot be avoided, proposals should clearly demonstrate that all reasonable efforts have been made to minimise and mitigate the harm through appropriate design, layout, and materials. Where less than substantial harm is identified, this will be weighed against the public benefits of the proposal. It should be noted that even 'less than substantial harm' can still amount to considerable harm and can still be a reason for refusal should the harm be considered to outweigh the benefits of a proposal. When assessing less than substantial harm, a balanced judgement will be made having regard to the scale of any harm or loss and to the significance of the heritage asset. In the first instance, development should be located in areas that avoid harm to heritage assets. Where this is not possible, options should be explored to minimise harm. Only when all other options have been exhausted should the public benefits of a proposal be considered, and these benefits must clearly and convincingly outweigh any identified harm.</u></p>			
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	<p>The following text is proposed to be added to the start of Paragraph 11.53: -</p> <p><u>The policy differentiates between historic farmstead buildings (Clause 2(a)) and other forms of non-designated heritage assets (Clause 2(b)). This reflects the unique contribution that historic farmsteads make to the Borough's rural character and landscape. The Council seeks to resist harm to all heritage assets, in line with the NPPF. However, the policy highlights historic farmsteads due to their particular importance to the character of the Borough. Clause 2(a) therefore seeks to resist the demolition of buildings associated with historic farmsteads. Clause 2(b) provides a framework for assessing proposals affecting a wider range of non-designated heritage assets, requiring a balanced judgement based on the asset's significance, proposed mitigation, and the scale of any harm or loss.</u></p> <p>In response to the issues raised to Clause 3, the following text is proposed to be added to paragraph 11.54: -</p> <p><u>Heritage Assessments (HAs) accompanying development proposals should clearly identify any potential harm to heritage assets or their settings and should set out a hierarchical approach to dealing with any identified harm. As outlined in Clause 2 of this policy, all opportunities to avoid harm should be sought in the first instance. Where harm cannot be avoided, the HA should outline any mitigation measures that will be implemented to minimise any impacts on the heritage asset. Where proposals will result in less</u></p>			
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	<p><u>than substantial harm, the HA should set out the public benefits of the proposal. These will then be weighed against any residual harm. For proposals resulting in substantial harm, the HA should clearly set out the public benefits that would justify this harm in line with the tests set out in the NPPF. It is expected that any such harm would be wholly exceptional. All development proposals should also seek to identify opportunities for enhancing the significance of the Borough's heritage assets, as set out in the policy.</u></p> <p>In response to the comments on clause 4(b), the clause is proposed to be removed from the Local Plan Policy SE9</p> <p>In response to the comments on archaeological features, the following text is proposed to be added: -</p> <p><u>6. When considering proposals that may affect heritage assets with archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation, may be required. This assessment should be carried out by a suitably qualified professional in accordance with relevant guidance.</u></p> <p>And a new para 11.54a, as follows: -</p> <p><u>The historic environment encompasses a wide range of heritage assets, including buildings, monuments, sites, places, areas, or landscapes, and including any archaeological remains. When considering proposals that may affect heritage assets with archaeological interest, an appropriate desk-based assessment and, where</u></p>			
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	<u>necessary, a field evaluation, will be required. This assessment should be carried out by a suitably qualified professional in accordance with relevant guidance. The Council will expect any such assessments to demonstrate an understanding of the potential impact of the proposed development on the archaeological significance of the asset, and to set out appropriate mitigation measures to avoid or minimise any harm. It should be noted that all archaeological remains are a finite and irreplaceable resource, and any harm to them should be avoided wherever possible. Where necessary, the Council will use planning conditions or obligations to secure appropriate archaeological investigation, recording, and mitigation measures</u>			
Suggests recognising the role of neighbourhood plans in providing more locally specific heritage policies.	This comment regarding the role of Neighbourhood Plans duplicates a point made in comment NULLP497 and is addressed in the response above.	No changes required.	NULLP398	Audley Rural Neighbourhood Plan Steering Group
Suggests taking greater account of neighbourhood plans and their ability to provide more specific policies on heritage.	The Council acknowledges Mr. Bland's suggestion that greater account be taken of the role of neighbourhood plans. As stated in the response to Audley Parish Council (NULLP497), Neighbourhood Plans form a material consideration in the planning process, and their heritage policies will be given due weight, in accordance with the NPPF, providing the ability for locally specific policies to be considered.	No changes required.	NULLP371	S Bland
Questions the wording of Policy SE9, paragraphs 1 (e and f), arguing there are no exceptional circumstances justifying substantial harm/loss to listed buildings or registered	The Council acknowledges the concerns raised regarding the wording of Policy SE9, paragraphs 1 (e and f), and the potential for substantial harm or loss to listed buildings or registered parks and	No changes required.	NULLP637	Cross Heath, Wolstanton and May Bank

<p>parks/gardens. Suggests amending Policy SE9 to clarify this.</p>	<p>gardens. The Council maintains that the existing policy wording, read in conjunction with the NPPF, provides a clear and appropriate framework for assessing such development proposals, balancing the need for development with the importance of heritage conservation. The policy requires exceptional circumstances and clear and convincing justification where substantial harm or loss to designated heritage assets is unavoidable and the benefits of the proposals would need to clearly outweigh any harm caused. The Council will consider providing greater clarification within the policy text if this is deemed necessary to fully align with the spirit and intent of national guidance on exceptional circumstances.</p>			<p>Branch Labour Party</p>
<p>Notes duplication between Policy SE9 and national policy, particularly criterion 2. Suggests making parts 2 and 3 more concise. Requests more clarity regarding archaeology and suggests the policy set out that archaeological surveys/investigations are not required where a development site comprises a redevelopment site that has already been built on, as this is likely to have destroyed any historical remains.</p>	<p>The Council acknowledges Aspire Housing's representation and notes their comments regarding potential duplication with national policy and the need for greater clarity regarding archaeology. The Council is confident that Policy SE9 effectively addresses the matters raised, providing clear guidance on heritage impact assessments and the consideration of harm to both designated and non-designated heritage assets. The Council will consider the suggested clarifications and additional details regarding archaeology as part of future Local Plan reviews and in line with any emerging standards.</p>	<p>No changes required.</p>	<p>NULLP886</p>	<p>Aspire Housing</p>
<p>Welcomes Policy SE9 and its comprehensiveness. Suggests that the policy could be enhanced by more specific reference to the setting of heritage assets and the cumulative impact of different proposals on heritage assets, as well as the need for archaeological assessments when appropriate.</p>	<p>The Council welcomes Staffordshire County Council's support for the inclusion of Strategic Objective SO-13 and Policy SE9. The Council shares the County Council's view that this comprehensive policy sets out a positive strategy for the historic environment, providing clarity and guidance on</p>	<p>No changes required.</p>	<p>NULLP1077</p>	<p>Staffordshire County Council</p>

Notes the inclusion of Policy SE9 in Strategic Objective SO-13.	relevant requirements. No further action is required.			
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61. Policy SE10 Landscape

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Strongly agrees with the Policy, point 3, alerting developers to use materials that reflect and strengthen the local landscape.	The Council thanks the Cross Heath, Wolstanton, and May Bank Branch Labour Party for their support of Policy SE7 and its emphasis on using materials that reflect and strengthen the local landscape. The Council shares the appreciation for high-quality design and its role in enhancing the built environment, as promoted by Policy SE10 and other related design policies within the Local Plan.	No changes required.	NULLP638	Cross Heath, Wolstanton and May Bank Branch Labour Party
Supports the policy recognising the importance of landscape character. Suggests adding a requirement that Landscape and Visual Impact Assessments (LVIAs) be prepared in accordance with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) 2013 (or subsequent updates) to ensure suitable methodology. Proposes adding a sentence to paragraph 11.58.	The Council acknowledges Staffordshire County Council's support for Policy SE10 and its recognition of the importance of landscape character. While the Council appreciates the suggestion to include a specific reference to the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment (GLVIA3) within paragraph 11.58, we believe the existing wording, which requires LVIAs to be "proportionate to the scale and likely impact of the proposals," provides sufficient guidance on appropriate methodology. This flexible approach allows for consideration of a range of assessment methods and tools, ensuring that the assessment is tailored to the specific circumstances of each development. Further details are set out in the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and other guidance and supplementary planning documents. The Council recommends that applicants refer to these documents.	No changes required.	NULLP1094	Staffordshire County Council
A wide-ranging response covering numerous policies. For SE10, welcomes the policy's aim to	The Council acknowledges Natural England's extensive comments on the Local Plan. Regarding	No changes required.	NULLP1334	Natural England

<p>ensure development protects and enhances the borough's character, quality, beauty, and tranquillity. Notes the Sustainability Appraisal identifies the southern portion of the borough as highly sensitive to landscape change. Agrees there is potential for cumulative adverse effect on landscape character from development. Supports Policy SE11. Suggests policy SE13 give appropriate weight to soil functionality and ecosystem services, recommends stronger wording. Suggests incorporating Natural England's Green Infrastructure Framework. Recommends the HRA include ammonia sourced from traffic emissions. Suggests several strategic site allocation modifications.</p>	<p>Policy SE10 specifically, the Council welcomes Natural England's support for the policy's aim to protect and enhance the character, quality, beauty, and tranquillity of the Borough. The Council confirms that it has given due consideration to the Landscape and Settlement Character Assessment Study (2022) and the potential for cumulative effects from development, and that these factors are reflected in the site selection and allocation process, as outlined in Policy SE10 and the supporting text. The more detailed and specific points raised by Natural England regarding air quality, BMV agricultural land, the Duty to Cooperate, strategic objectives, and site allocations will be addressed under the relevant sections of the Local Plan, demonstrating a comprehensive and robust approach to environmental considerations. The Council has considered Policies SE11, SE13, and SE14 with regards to BNG, soil management, green/blue infrastructure, landscape sensitivity, and the allocation of strategic sites within the borough.</p>			
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62. Policy SE11 Trees, Hedgerows and Woodland

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
This is another wide-ranging response touching on many policies. The parts specifically relevant to SE11 are minimal. They welcome the policy's prioritisation of tree, hedgerow, and woodland retention and protection. They also mention the importance of recognising the policy's support for sustainable development (Strategic Objective SO-IV) by promoting responsible stewardship of natural resources.	The Council acknowledges Natural England's extensive comments on the Local Plan. Regarding Policy SE11 specifically, the Council welcomes Natural England's support for the policy's focus on the retention and protection of trees, hedgerows, and woodlands. The Council confirms that the policy prioritises these natural features as valuable elements of the Borough's landscape and promotes their active enhancement wherever possible, contributing to sustainable development and the responsible stewardship of natural resources. The more detailed and specific points raised by Natural England concerning air quality, BMV agricultural land, the Duty to Cooperate, strategic objectives, and site allocations will be addressed under the relevant sections of the Local Plan. The policy is considered to be consistent with national policy and guidance in line with Strategic Objective SO-IV in promoting the sustainable use and management of natural resources.	No changes required.	NULLP1336	Natural England

63. Policy SE12 Amenity

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Requests amending criterion 2 to include odour and vibration impact assessments. Proposes the following amended wording: "New development should effectively integrate with existing uses, and existing businesses and community facilities must not have unreasonable restrictions placed on them as a result of new development. Where the operation of an existing business or facility could have a significant adverse effect on a proposed new development in its vicinity, the applicant (developer) should provide a suitable assessment, <i>such as a noise, vibration and odour impact assessments or a light pollution study</i> , to demonstrate the following:" (emphasis on added text).	The Council thanks United Utilities for their suggested amendment to criterion 2 of Policy SE12. The Council agrees that clarifying the scope of assessments to include odour and vibration impacts would enhance the policy and provide a more comprehensive approach to amenity considerations. The policy wording will therefore be amended to reflect this suggestion. The revised policy will now state that assessments should consider "noise, vibration, and odour impact assessments or a light pollution study" ensuring a wider range of impacts on amenity is taken into consideration when assessing proposals, as per UU's suggestion. This will reinforce the need to minimise impacts on the amenities of surrounding areas whilst supporting sustainable development and promoting healthy communities. This is also consistent with the approach set out in Policy SE1 Pollution and Air Quality.	Amend the introductory text to SE12 (2) as follows: - 2 New developments.... Where the operation of an existing business or facility could have a significant adverse effect on a proposed new development in its vicinity, the applicant (developer) should provide a suitable assessment, such as noise, vibration and odour impact assessments or a light pollution study, to	NULLP796	United Utilities

		demonstrate the following....		
This comment is focused on the potential impact of residential development proposed under Policy TC22 (Marsh Parade) on The Rigger music venue, raising concerns about noise complaints and advocating for the Agent of Change principle to be applied. The comment includes information about MVT's role in protecting grassroots music venues, the economic and cultural contributions of these venues, and the challenges they face from noise complaints and redevelopment.	The Council acknowledges Music Venue Trust's (MVT) comments regarding the potential impact of the Marsh Parade development (Policy TC22) on The Rigger music venue. As these comments relate specifically to Policy TC22 and the potential impact of a particular development on this venue, they will be addressed in the response to that policy. It is important that we consider the views of all those involved in these consultations, and we are supportive of local businesses and the protection of local cultural venues.	No change required	NULLP1206	Music Venue Trust

64. Policy SE13 Soil and Agricultural Land

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Another broad response covering various Local Plan elements. Regarding Policy SE13 specifically, Natural England expresses concerns about the justification for the loss of Best and Most Versatile (BMV) agricultural land. They note the Sustainability Appraisal's statement about the potential loss of up to 263ha of BMV land due to proposed site allocations. They also highlight their role as a statutory consultee on developments involving the loss of over 20ha of BMV land. They request an understanding of the evidence base/options assessment informing the strategic site allocations.	The Council acknowledges Natural England's extensive comments on the Local Plan. Regarding Policy SE13, the Council appreciates the feedback and confirms that it supports the aims of the policy to protect the Borough's best and most versatile (BMV) agricultural land and promote sustainable soil management practices. The Council acknowledges Natural England's concerns about the potential loss of BMV agricultural land resulting from the proposed site allocations and confirms that it has carefully considered the cumulative impacts of development, balancing the need for new housing and employment land with the importance of safeguarding valuable agricultural resources. This assessment is reflected in the site selection and allocation process, as outlined in the supporting text to Policy SE13, and the Council maintains that the chosen approach appropriately balances these competing interests. The more detailed and specific points raised by Natural England concerning air quality, the Duty to Cooperate, strategic objectives, and specific site allocations will be addressed under the relevant sections of the Local Plan. The Council welcomes Natural England's ongoing engagement regarding assessment of the evidence base for strategic site allocations. The Council will carefully consider the cumulative impacts of the loss of best and most versatile agricultural land and any associated	No change required.	NULLP1335	Natural England

	impacts on ecosystem services both locally and nationally.			
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65. Policy SE14 Green and Blue Infrastructure

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Thanks the Council for noting that enhancing canal towpaths supports biodiversity and active travel. Requests amendments to part 3(b) and paragraph 11.67 to clarify that permission is needed for towpath enhancements and to correct the Trust's name (singular).	The Council thanks the Canal & River Trust for their support of Policy SE14. The Council considers that the policy supports the enhancement of the canal network and its role in supporting sustainable transport and improving green infrastructure within the borough but does not require the specific insertion of towpaths in criteria 3b.	No change required	NULLP201	Canal & Rivers Trust
Recommends including a clause in the policy relating to heritage assets and their setting, as heritage is an integral part of green and blue infrastructure.	The Council acknowledges Historic England's suggestion to include a clause in Policy SE14 relating to heritage assets. The Council maintains that the existing policy wording, which promotes the protection and enhancement of green and blue infrastructure, inherently includes consideration of heritage assets and their settings. This holistic approach, as set out in Policy SE14 and reinforced by Policy SE9 (Historic Environment), ensures that heritage considerations are integrated into all relevant aspects of development proposals.	No change required	NULLP524	Historic England
Supports criterion 1, which identifies the need to incorporate multifunctional green and blue infrastructure elements from the outset of the design process. No modifications proposed.	The Council thanks United Utilities for their support of criterion 1 of Policy SE14, which emphasises the need to incorporate multifunctional green and blue infrastructure elements from the outset of the design process. The Council shares UU's view on the importance of integrated design and the benefits of multifunctional green and blue infrastructure, as promoted in the policy.	No change required	NULLP797	United Utilities

Asks whether Lyme Park, as new green infrastructure, should be included within this policy.	The Council acknowledges Mr. Willard's query regarding the inclusion of Lyme Park. Lyme Park, as a proposed country park, would be included within the scope of this policy, which supports the development of new green infrastructure within the borough.	No change required	NULLP1237	G Willard
Another broad response, much of which is duplicated from previous submissions. Regarding SE14 specifically, they welcome the policy and suggest several enhancements: providing additional detail on canals and the benefits they provide, incorporating Natural England's Green Infrastructure Framework, referencing the emerging Local Nature Recovery Strategy, providing more specific examples of how green and blue infrastructure can be integrated with health priorities, requiring SuDS for all major developments, emphasising access to high-quality green space, requiring detailed management/maintenance plans for new GI assets, exploring funding mechanisms for maintenance, and promoting community involvement in GI planning/design/management.	The Council acknowledges Natural England's extensive comments on the Local Plan. Regarding Policy SE14, the Council welcomes Natural England's support for the policy's focus on the integration of green and blue infrastructure. The Council is committed to creating a well-connected network of green and blue infrastructure, delivering multiple benefits for both people and the environment, as promoted by the existing policy. The Council will consider the detailed points raised by Natural England concerning canals, the Green Infrastructure Framework, the Local Nature Recovery Strategy, links with health and green infrastructure, SuDS requirements for all developments, green space quality, management plans and funding mechanisms at a later date and as part of future Local Plan reviews and the preparation of the Local Nature Recovery Strategy (LNRS) and associated statutory documents. This approach ensures that the Council considers stakeholder input while maintaining a strategic and evidence-based approach to green and blue infrastructure planning.	No change required	NULLP1337	Natural England

66. Rural Matters

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

67. Policy RUR1 Rural Economy

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
RUR 1, Clause 2e: Insert 'appropriate' at the beginning to the sentence to ensure that it is appropriate reuse only that is considered.	The policy is clear that the re-use of the building should conserve and where possible enhance the significance of the farm building and be in accordance with policy SE9.	No change required	NULLP525	Historic England

68. Policy RUR2 Rural Workers Dwellings

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

69. Policy RUR3 Extensions and Alterations to Buildings Outside of Settlement Boundaries

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
RUR 3, Clause 1e: Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.	Noted	Amend criterion RUR3, clause 1e, as follows: - e. Protect Sustain and enhance the significance of any affected heritage assets (and including their settings) in accordance with Policy SE9 (Historic Environment)	NULLP526	Historic England

70. Policy RUR4 Replacement Buildings Outside of Settlement Boundaries

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
RUR 4, Clause 1g: Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.	Noted	Propose to amend as follows: - 1(g). The proposals sustain -protect and enhance the significance of any affected heritage assets including (and their settings in accordance with Policy SE9 (Historic Environment)	NULLP527	Historic England
RUR 4, Clause 2i: Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.	Noted	Propose to amend as follows: - 2i The proposals sustain -protect and enhance the significance of any affected heritage assets including (and their settings in accordance with Policy SE9 (Historic Environment)	NULLP528	Historic England

71. Policy RUR5 Reuse of Rural Buildings for Residential Uses

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
RUR 5, Clause 1f: Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.	Noted	The proposals sustain protect and enhance the significance of any affected heritage assets, including buildings formerly associated with a historic farmstead (and including their settings) in accordance with Policy SE10 SE9 : Historic Environment	NULLP529	Historic England

72. Site Allocations

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Why / how have outcomes of the Strategic Housing and Employment Land Availability Assessment has changed for sites during the development of the Local Plan	The Strategic Housing and Employment Land Availability Assessment has been updated through the development of the Local Plan to capture new information or changes in circumstances.	No change required	NULLP1294	Talke Action Group
Brownfield sites are available and should be looked at again i.e. Knutton Community entre	The Council has considered the allocation of brownfield sites through the site selection process. The work has to be prepared as a snapshot in time. Sites at Knutton are proposed to be allocated in the Local Plan.	No change required.	NULLP1294	Talke Action Group
Not clear that brownfield sites have been considered prior to Greenbelt sites	The approach of the Council on this matter is set out in the Plan Strategy Topic Paper, pg. 36 [ED031].	No change required	NULLP1224	D Barlow
Not clear the appropriate traffic surveys have taken place	The Local Plan is supported by a strategic transport assessment and the policy context for individual sites will	No change required	NULLP1224	D Barlow

	require additional information / consideration at the Planning Application stage			
Site at Birchenwood Way (RC14 in representation admin note, RC11 in the SHELAA) should be included in the Local Plan – concerns how the site selection process has considered this site	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required	NULLP 240	Wardell Armstrong on behalf of S&S Anthony
Site at Slaken Lane (admin note BL3/BL4 in the SHELAA) should be allocated in the Plan. The Plan is not positively prepared, effective of consistent with national policy.	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP906	Gleeson Regeneration Limited
Land at New Farm, Cross Lane (AB78/AB79 in the SHELAA) Audley should be allocated in the Local Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP941	Manor View Care Home Ltd
Land at Stone House Farm, Woodside should be included in the Baldwins Gate Settlement Boundary (LW74 in the SHELAA)	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP954	Knights on behalf of Hamnett

Land at Main Road Betley (Betley Court Farm) should be allocated in the Local Plan.	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP933	Knights on behalf of F and J Speed
Land south of Eccleshall Road, Loggerheads (LW54) should be allocated in the Local Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP771	Gladman Developments Limited
High Street, Newchapel (NC78) should be allocated in the Local Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP798	Knights on behalf of Seddon Homes
Land at Woodside, Baldwins Gate should be allocated in the Local Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP687	Stantec on behalf of Jones Homes and Renew Land Ltd
Objection to Site Selection Methodology at Stage 3 which, as above, is stated as: "Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on	The Site Selection process has still considered the merits of sites for allocation, as documented in the site selection report [ED029]	No change required	NULLP687	Stantec on behalf of Jones Homes and Renew Land Ltd

alignment with the distribution of development and relationship to the settlement hierarchy of centres” In essence, the SSM states that once it has found enough sites to meet the required number of dwellings within a centre, it can take the decision to discontinue the search for sites. In the case of Baldwins Gate specifically, this is a completely circular argument and self-fulfilling.				
<p>Sites promoted at: -</p> <p>(a) Cross Street Phase 2 – this site has planning consent for 43 affordable homes and Aspire expect to start construction during October 2024.</p> <p>(b) Cross Street Phase 2 – a planning application for 71 supported living apartments under application reference 22/00653/FUL was withdrawn on 2 May 2023. Aspire recently gained planning permission for an alternative scheme of 39 affordable dwellings.</p> <p>(c) Gloucester Grange – this site comprises vacant moribund accommodation with prior approval for its demolition obtained from the Council. This site has recently been sold by Aspire and is currently being refurbished for private tenants.</p>	Noted	No change required	NULLP903	Knights on behalf of Aspire Housing

Site promoted as an omission site, adjacent to Mucklestone Wood Lane site	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP918	Knights on behalf of Shropshire Homes
Site at TK30, land off Talke Roundabout should be allocated in the Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP1031	WSP on behalf of Harworth Group PLC
Site at Newcastle Road Talke should be allocated in the Plan for electric vehicle charging facilities (TK29)	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP715	Knights on behalf of Evolution 500
Land at NC77 in Newchapel should be allocated in the Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP711	Condate Limited on behalf of J. Two.Ltd
Moss lane, Madeley should be allocated in the Local Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP968	Pegasus Group on behalf of Keepmoat homes

Land at Quarry Bank Road, Keele should be allocated in the Local Plan (KL21	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP1057	Asteer on behalf of Persimmon Homes Limited
Land at Madeley Heath (MD12A) Should be allocated in the Local Plan	The site selection report [ED029] has considered the suitability of sites for allocation (or not) in the Local Plan supported by appropriate evidence.	No change required.	NULLP986	Lichfields on behalf of Madeley Heath Developments Limited.

73. Policy SA1 General Requirements

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Table SA1 – Sustainable Drainage – should refer to Canal & Rivers Trust	Noted	Reference to Canal & Rivers Trust updated	NULLP202	Canal and Rivers Trust
Reference to masterplans – should consult with statutory consultees where relevant	Noted	No change required	NULLP530	Historic England
Reference to masterplans - reference to a site wide strategy for foul and surface water management is needed.	This matter is covered in the Flood Risk / Assessment / Surface Water Drainage strategies on page 109 of the Local Plan	No change required	NULLP800	United Utilities
For the reference to Amenity – reference to appropriate impact assessments	The environmental health section of table 6 considers the need for a number of relevant assessments	No change required	NULLP800	United Utilities
For flood risk, wording is suggested to emphasise the additional expectations and engagement with statutory providers	It is considered that the wording, as drafted, is appropriate	No change required	NULLP800	United Utilities
Question whether masterplans are needed for all sites	Masterplans are considered necessary for major development sites to ensure compliance with relevant policies in the Plan.	No change required	NULLP842	Emery Planning on behalf of strategic land group
Masterplan requirements set out in the table should include clear mechanisms for approving	The table makes clear that the masterplans will need to be agreed with the Council to ensure	No change required	NULLP842 NULLP656 NULLP1014	Emery Planning on behalf of strategic land group Pegasus Group on behalf of Araripe Limited

masterplans through the planning application process.	policy compliant developments			Lichfields on behalf of McCarthy Stone
There is a need to recognise that a pragmatic approach may be needed when considering whether a scheme follows a masterplan for market facing reasons	Noted	No change required	NULLP1014	McCarthy Stone
Green Belt Compensatory boundaries – should refer to landownership and deliverability constraints in line with the planning practice guidance	The section on compensatory improvements makes clear that the scope of the improvements will be informed by early engagement with relevant bodies including landowners.	No change required	NULLP842	Emery Planning on behalf of strategic land group
Approach of SA1 is supported. Additional text should be added for Minerals Plan review	Noted. The relevant minerals text is considered to reflect the current adopted Minerals Plan.	No change required	NULLP1099	Staffordshire County Council

74. Audley

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Overall levels of development are too high	This point is considered in the proforma for PSD1 'Overall Development Strategy'	No change required	NULLP57	I Rowley
Green belt development unnecessary	The housing and employment Plan Strategy papers consider the exceptional circumstances case for allocations in the Local Plan [ED031/ED032]	No change required	NULLP57	I Rowley
Road network is unable to cope	The Plan is supported by a Strategic Transport Assessment which has considered the implications on the road network [ED011]	No change required	NULLP559 NULLP560	E Harrison S Harrison
Infrastructure (health / education) unable to cope	The Local Plan is supported by an infrastructure delivery plan which has identified those items required to support allocations in the Local Plan in the form of direct provision and / or contributions towards development.	No change required	NULLP559 NULLP560	E Harrison S Harrison
Construction impacts	For major schemes, policy SA1 requires a construction	No change required.	NULLP57	I Rowley

	management plan to direct the construction activities associated with development			
Site AB32 (adjacent to AB33) should be released from the Green Belt as it will be surrounded on 3 sides by development.	The site has been considered through the site selection report [ED029] and not considered suitable for allocation at this time.	No change required	NULLP926	V&P Malkin
Environmental impact of development is concerning	The site selection report has considered the suitability of the sites for allocation.	No change required	NULLP1338	L Warburton

75. Policy AB2 Land at J16 of the M6

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Object to allocation, but if allocated then a detailed development brief should be created after consultation with interested parties	The Council acknowledges the suggestion for a detailed development brief for site AB2. However, the Council considers that the specific requirements set out in Policy AB2, together with the overarching framework provided by other relevant Local Plan policies, provide a sufficiently robust basis for guiding development of the site. These policies, along with the supporting evidence base, address a wide range of issues, including access, design, landscaping, heritage, biodiversity, and flood risk, and will ensure that any future development is well-designed, sustainable, and integrated with its surroundings. Furthermore, the requirement for a masterplan, as set out in Policy SA1, will ensure that these matters are considered holistically across the entire allocated area. While a separate development brief is not considered necessary, the Council remains committed to engaging with the local community and stakeholders throughout the planning process and will provide further opportunities for public consultation at the planning application stage.	No change required	NULLP66 NULLP419 NULLP589	Weston and Crewe Green Parish Council Cholmondeston and Wettenhall Parish Council The Barthomley Action Group

Concerns over locational sustainability (remoteness) of the site	<p>The Council acknowledges the concerns raised regarding the locational sustainability of the AB2 site. Whilst the site is not located within an existing urban area, the Council considers that its strategic location adjacent to the A500 and Junction 16 of the M6 motorway provides significant opportunities for sustainable economic growth and employment, in line with the objectives set out in Policy PSD1: Overall Development Strategy and Policy EMP1: Employment. The site is allocated as a strategic employment site specifically to meet the need for large-scale employment land in the Borough, which cannot be met within existing urban areas or on previously developed land.</p> <p>The Council recognises the importance of ensuring that the development is accessible by a range of sustainable transport modes, in addition to the strategic road network. To address this, Policy AB2 includes specific requirements for a comprehensive travel plan (criterion 13) incorporating measures to support sustainable travel to and from the site, including cycle links, bus provision, and demand responsive transport. This will help to reduce reliance on private vehicles and promote more sustainable travel patterns. The travel plan will need to demonstrate how the development will</p>	No change required	NULLP207 NULLP382 NULLP343 NULLP38 NULLP81 NULLP115 NULLP170 NULLP79 NULLP661 NULLP417 NULLP692 NULLP589 NULLP477 NULLP706 NULLP1251 NULLP693 NULLP701 NULLP1027 NULLP992	A Nelson Audley Rural Neighbourhood Plan Steering Group D O'Dwyer K Barlow B Sutton K Barlow A Hughes W Potts C Bielby A Edwards S Deacon The Barthomley Action Group Audley Parish Council N Pustkowski J Moreau J Austin E Austin CPRE Staffordshire Alsager Town Council
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	<p>link into and enhance existing or proposed walking, cycling or public transport infrastructure, and should set out the measures that will be implemented to encourage and enable sustainable and active travel. Furthermore, the policy requires the provision of strategic open space within the northern centre of the site (criterion 15), which will help to enhance the green infrastructure network in the area and provide opportunities for recreation and biodiversity.</p> <p>The Council is committed to ensuring that the development of AB2 is carried out in a sustainable manner and that it contributes to the overall sustainability objectives of the Local Plan. The detailed design and layout of the development will be subject to further scrutiny at the planning application stage, and the Council will work with the developer and relevant stakeholders to ensure that all potential impacts are appropriately mitigated, and that the development contributes positively to the local community and the environment. The Council has also considered the guidance set out in the NPPF which states that policies and decisions should enable sustainable growth and expansion of such businesses in rural areas.</p>			
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Concerns over the traffic impacts of the site, including safety / access from the A500 and also emergency access from Bathomley Road. Impact on rural roads in and around Audley.	<p>The Council acknowledges the concerns raised regarding the potential traffic impacts of the proposed development at AB2. The Council is committed to ensuring that new development does not result in unacceptable impacts on the local or strategic road network, and that appropriate measures are in place to mitigate any adverse effects. The allocation of AB2 for strategic employment use has been supported by a comprehensive Strategic Transport Assessment (STA) [ED011], which considered the potential impacts of development on both the local and strategic road networks. The STA includes detailed modelling and analysis of traffic flows, junction capacity, and access arrangements, considering existing traffic conditions, committed developments, and the anticipated traffic generation associated with the proposed development at AB2.</p> <p>The Council recognises the concerns raised regarding the A500 and its junctions. The STA has specifically assessed the impact of the development on the A500, including Junction 16, and has identified a number of mitigation measures that will be required to ensure that the development does not result in severe residual cumulative impacts on the strategic road network. These</p>	No change required	NULLP207 NULLP1157 NULLP382 NULLP343 NULLP62 NULLP346 NULLP1135 NULLP66 NULLP38 NULLP132 NULLP56 NULLP170 NULLP118 NULLP250 NULLP178 NULLP157 NULLP166 NULLP283 NULLP272 NULLP276 NULLP294 NULLP158 NULLP167 NULLP571 NULLP466 NULLP356 NULLP470 NULLP561 NULLP553 NULLP551 NULLP488 NULLP292 NULLP661 NULLP423 NULLP564	A Nelson Cllr R Lewis Audley Rural Neighbourhood Plan Steering Group D O'Dwyer I Rowley D Foss C Stratton Weston and Crewe Green Parish Council K Barlow A Moody D Watts A Hughes Mr and Mrs Pedley N Ginnis D&A Beeston A Darlington J Burgess A Wood B Harrison A Wood J Austin J Darlington A Thys M Bielby E Johnson K Hackforth DJ Thorley E Harrison F Horne J Brown R Carter S Hough C Bielby
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	<p>measures, which may include junction improvements and other highway works, will be secured through planning obligations or other appropriate mechanisms.</p> <p>In addition, the Council acknowledges the concerns raised regarding the use of Barthomley Road for emergency access. The Council confirms that this access is intended to provide an alternative means of access and egress for emergency vehicles only and that it will not be used for general traffic. The detailed design and operation of the emergency access will be subject to further scrutiny at the planning application stage, in consultation with the emergency services and the local highway authority, to ensure that it is safe and appropriate for its intended purpose.</p> <p>With regard to the potential impacts on the local road network, including rural roads in and around Audley, the Council is aware that any increase in traffic volumes could have implications for road safety, congestion, and amenity. Criterion 13 of AB2 includes the requirement for a comprehensive travel plan, which will promote sustainable travel and active travel, including providing safe and convenient routes for cyclists, pedestrians, and public transport users. The travel plan will also need to demonstrate how the</p>		<p>NULLP969 NULLP419 NULLP1032 NULLP904 NULLP359 NULLP664 NULLP852 NULLP692 NULLP573 NULLP833 NULLP454 NULLP753 NULLP477 NULLP706 NULLP382 NULLP825 NULLP682 NULLP905 NULLP517 NULLP427 NULLP469 NULLP1251 NULLP679 NULLP835 NULLP939 NULLP938 NULLP609 NULLP658 NULLP602 NULLP702 NULLP693 NULLP607 NULLP980 NULLP1156 NULLP1027</p>	<p>K Edge S Harrison Keele Parish Council Cholmondeston and Wettenhall Parish Council J Gilmour R Nix J Hackford M Bielby K Cuthbert S Deacon P Cole S Thorrington S Livingston C Hoban Audley Parish Council N Pustkowski Audley Rural Neighbourhood Plan Steering Group T Thorrington Wright B Smith R King R Poppleton A Kelter P Ritchie J Moreau M Colclough C Trenchard M Harrison T Lovatt M Johnson D Madew A Williams E Austin J Austin</p>
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	development will link into and enhance existing or proposed walking, cycling or public transport infrastructure, including any infrastructure improvements that may be required to mitigate the impact of the development on the local road network. The Council will work with the developer, the local highway authority, and other stakeholders to ensure that any necessary highway improvements are delivered alongside the development. The Council is confident that, through the implementation of appropriate mitigation measures and the promotion of sustainable transport options, the potential traffic impacts of the proposed development at AB2 can be effectively managed and that the development can be accommodated without causing unacceptable harm to the local or strategic road network. The detailed design and layout of the development, including access arrangements and any necessary highway improvements, will be subject to further scrutiny at the planning application stage.		NULLP1314 NULLP1118 NULLP1138 NULLP994 NULLP1126 NULLP1151 NULLP1163 NULLP1212 NULLP1123 NULLP1247 NULLP1208 NULLP992 NULLP1158 NULLP1137 NULLP989 NULLP1260 NULLP1181 NULLP1140 NULLP590 NULLP690 NULLP1165 NULLP1249 NULLP1290 NULLP1274 NULLP1213 NULLP1427 NULLP599 NULLP1252	A Chatfield J Farrington B Riley CPRE Staffordshire J Humphreys K Humphreys C Whitney D Webb K Hoban M Montague J Reynolds P Spode RI Evans S Hopkins D Spode Alsager Town Council L Johnson M Davies J Johnson R Phillips D Grocott A Riley E Stringer C Gibson P Barber L Ford S Adams S Slaney P Spode M Kerr S Reeves C Halsall
An independent traffic survey by PAPG contradicts the strategic transport assessment.	The Council acknowledges the concerns raised regarding the potential traffic impacts of the proposed development	No change required	NULLP1157 NULLP1251 NULLP1123	Cllr R Lewis J Moreau RI Evans

	<p>at AB2 and notes that a traffic survey has been undertaken by the PAPG group. The Council, in preparing the Local Plan, has relied on the Strategic Transport Assessment (STA) which was prepared in accordance with recognised best practice, and utilised the North Staffordshire Multimodal Model (NSMM) to assess the cumulative impact of the proposed allocations, including AB2, on the road network. The NSMM is a strategic transport model that is widely used for transport planning purposes and is considered to be a robust tool for assessing the broad traffic impacts of development.</p> <p>The Council is committed to ensuring that all new development in the Borough is supported by appropriate transport infrastructure and that any potential impacts on the local road network are fully and appropriately mitigated. To this end, the Council will require any future planning application for development of AB2 to be supported by a detailed Transport Assessment. This assessment will need to consider the specific characteristics of the proposed development, including the proposed access arrangements, and will need to demonstrate that any potential traffic impacts can be mitigated to an acceptable level.</p>		<p>NULLP1249</p> <p>NULLP1252</p>	<p>L Ford</p> <p>C Halsall</p>
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	<p>The Transport Assessment will be required to consider a range of factors, including the impact of the development on the local road network, the need for any off-site highway improvements, and the provision of sustainable transport options, such as walking, cycling, and public transport. The assessment will also need to consider any relevant local and national planning policies and guidance, including the policies set out in the Local Plan.</p> <p>The Council will carefully consider the findings of the Transport Assessment, alongside any other relevant evidence, in its determination of any future planning application for the site. The Council will also work closely with the Local Highway Authority, and other relevant stakeholders, to ensure that any necessary mitigation measures are secured through planning conditions or obligations.</p> <p>The Council is confident that, through this robust assessment process and the implementation of appropriate mitigation measures, any potential traffic impacts associated with the development of the AB2 site can be effectively managed and that the proposed development can be accommodated without causing unacceptable harm to the local road network or the wider environment.</p>			
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Lack of public transport to AB2	<p>The Council acknowledges the concerns raised regarding the current level of public transport provision serving the AB2 site. The Council recognises that access to sustainable transport options is a key consideration in the planning of new development and is committed to promoting a shift towards more sustainable modes of travel, in line with Policy PSD1 (Overall Development Strategy), Policy PSD6 (Health and Wellbeing), Policy IN2 (Transport and Accessibility), and Policy CRE1 (Climate Change).</p> <p>The allocation of AB2 for strategic employment development is supported by a comprehensive policy framework, which seeks to ensure that the site is developed in a sustainable and accessible manner. Criterion 13 of Policy AB2 specifically requires the implementation of a comprehensive travel plan that incorporates measures to support travel to and from the site by sustainable modes, including public transport.</p> <p>This travel plan will need to identify specific measures to improve public transport accessibility to the site, which could include, but are not limited to:</p> <ul style="list-style-type: none"> Enhanced bus services: Working with bus operators to increase the frequency and/or extend the routes of existing bus services to serve the site, potentially including new or 	No change required	NULLP1135 NULLP343 NULLP38 NULLP170 NULLP79 NULLP157 NULLP166 NULLP272 NULLP167 NULLP571 NULLP343 NULLP1032 NULLP589 NULLP454 NULLP477 NULLP706 NULLP607 NULLP1127 NULLP1163 NULLP992 NULLP1109 NULLP1165 NULLP1249 NULLP1274	C Stratton D O'Dwyer K Barlow A Hughes W Potts A Darlington J Burgess B Harrison A Thys M Bielby D O'Dwyer J Gilmour The Barthomley Action Group S Livingston Audley Parish Council N Pustkowski A Chatfield K Hoban J Reynolds Alsager Town Council M Clewes P Barber L Ford S Slaney
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	<p>improved services connecting to nearby residential areas, town centres, and other key destinations. The Council will also explore opportunities to improve connectivity with Kidsgrove Railway Station, consistent with Strategic Objective SO-7 of the Local Plan.</p> <ul style="list-style-type: none"> • Bus stop infrastructure: Providing new or upgraded bus stops within and adjacent to the site, ensuring they are accessible, safe, and well-lit, and providing real-time passenger information where appropriate. • Demand-responsive transport: Investigating the potential for demand-responsive transport services, such as shuttle buses or shared taxi schemes, to provide flexible and convenient access to the site, particularly for shift workers. • Cycle parking and facilities: Providing secure and convenient cycle parking facilities at the site, as well as changing rooms and showers, to encourage cycling as a viable mode of travel for employees. • Walking and cycling links: Improving pedestrian and cycle connections between the site and the surrounding area, including the provision of new or enhanced 			
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	<p>footpaths and cycleways, to facilitate safe and convenient access to the site by non-car modes.</p> <ul style="list-style-type: none"> • Car sharing and car clubs: Promoting and facilitating car sharing and car club schemes to reduce the number of single-occupancy car journeys to and from the site. • Travel planning for employees: Working with future employers on the site to develop and implement workplace travel plans that encourage employees to use sustainable modes of transport, through measures such as providing information on public transport options, offering incentives for cycling or walking, and implementing flexible working arrangements. <p>The specific details of the public transport improvements and other sustainable transport measures will be determined through the development of the travel plan, in consultation with relevant stakeholders. The Council will expect any future planning application for the site to demonstrate how the proposed development will deliver a comprehensive and effective travel plan that maximises opportunities for sustainable travel and minimises reliance on the private car.</p>			
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	The Council is committed to ensuring that the development of AB2 contributes to a more sustainable transport network in the Borough and supports the wider objectives of the Local Plan.			
Queries regarding the transport model undertaken in the Strategic Transport Assessment regarding the site.	Engagement in ongoing with National Highways, as shown in the DTC statement of Compliance document.	No change required	NULLP1288	National Highways
Further information is required regarding air quality impacts on Oakhanger Moss and Black Firs and Cranberry Bog SSSI.	This is considered in the DTC Statement of Compliance document.	No change required	NULLP1325	Natural England
Has the carbon impact of materials been considered alongside the operational impacts of the site?	The Council acknowledges the importance of considering the whole-life carbon impact of development, including both the embodied carbon associated with construction materials and the operational carbon emissions associated with the use of the development. The Council is committed to promoting sustainable construction practices and reducing carbon emissions across the Borough, in line with the objectives set out in Policy CRE1: Climate Change. Policy CRE1 requires all developments to follow the energy and heat hierarchy. Criterion 6 of this policy states that developments should use appropriate design, construction, insulation, layout, and orientation to create developments that are resilient	No change required	NULLP1132	K Hoban

	<p>to climate change, minimise energy use, use natural resources prudently, and promote the use, recovery, and recycling of materials to reduce embodied carbon. Criterion 6 goes on to state that the use of blue and green infrastructure, trees, and other planting should be used to provide opportunities for cooling and shading, and to connect habitats by using native plants that can meet the predicted climatic condition. The policy also requires the maximisation of both natural heating and ventilation through the orientation and location of buildings and choice (and colour) of materials, and the minimisation of the generation of waste and energy consumption in the design, construction, use, and life of buildings. Criterion 6 e) of Policy CRE1 also states that developers should provide evidence of construction methods that maximise the use of locally sourced recycled materials, and criterion f) states that, where possible, development should retain and creatively re-use existing buildings as part of new development to minimise the release of embodied carbon, and to design new buildings to enable easy material re-use and disassembly, reducing the need for end-of-life demolition. Criterion 6 also sets out requirements in relation to reducing</p>			
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	<p>carbon emissions from travel, the incorporation of SuDS, and the provision of space for physical protection measures.</p> <p>Whilst the policy does not explicitly require the use of a whole-life cycle carbon assessment, criterion 5 of Policy CRE1 encourages all developments to complete a whole-life cycle carbon assessment in accordance with the Royal Institute of Chartered Surveyors (RICS) Whole Life Carbon Assessment Guidance. Criterion 2 of Policy CRE1 also requires non-domestic developments to be designed to meet the BREEAM 'Excellent Standard', which includes consideration of the embodied carbon of materials.</p> <p>The Council will encourage developers to consider the embodied carbon of materials during the design process and to select materials with low embodied carbon wherever feasible. This could include, for example, the use of locally sourced materials, recycled materials, and materials with a high recycled content. The Council will also encourage developers to consider the use of innovative construction methods that can reduce the overall carbon footprint of the development, such as off-site manufacturing and modular construction.</p> <p>The Council is confident that, through the implementation of Policy CRE1 and</p>			
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	<p>other relevant policies in the Local Plan, the carbon impact of new development in the Borough, including the proposed development at AB2, will be minimised. The Council will work with developers to ensure that all new development is designed and constructed in a sustainable manner, considering the whole-life carbon impacts of the development.</p>			
Proximity to existing / proposed warehousing in NUL and Cheshire East. Some of these are sat empty.	<p>The Council acknowledges the concerns raised regarding the proximity of the proposed AB2 allocation to existing and proposed warehousing in the area, and the observation that some existing units may be vacant. The Council has carefully considered the need for additional employment land within the Borough through a detailed assessment of supply and demand. This assessment, which is set out in the Strategic Employment Sites Assessment 2023 and 2024 (ED002 and ED002a), concluded that there is a need for further employment land to be allocated to meet the future needs of the Borough, and identified the AB2 site as a suitable and commercially attractive location for strategic employment uses. The Assessment also concluded that the site is capable of accommodating large-scale employment uses that cannot be accommodated elsewhere in the Borough. The Council recognises that</p>	No change required	<p>NULLP1135 NULLP62 NULLP66 NULLP38 NULLP115 NULLP250 NULLP158 NULLP356 NULLP457 NULLP443 NULLP561 NULLP411 NULLP551 NULLP417 NULLP1032 NULLLP359 NULLP852 NULLP589 NULLP706 NULLP717 NULLP682 NULLP1251 NULLP913 NULLP679 NULLP841</p>	<p>C Stratton I Rowley Weston and Crewe Green Parish Council K Barlow N Ginnis J Darlington K Hackforth J Williams P Maddock E Harrison E Howell J Brown A Edwards J Gilmour J Hackforth K Cuthbert The Barthomley Action Group N Pustkowski H Cunningham B Smith J Moreau Mrs Rhodes M Colclough C Trenchard</p>

	<p>there may be some existing vacancies within the local employment land market, and that the economic climate can be subject to change. However, the Council considers that the allocation of AB2 is justified based on the long-term economic needs of the Borough and the strategic importance of the site in attracting inward investment and creating new jobs. The Council will continue to monitor the supply and demand for employment land and will work with developers and businesses to ensure that the allocated employment sites are brought forward in a timely and appropriate manner.</p>		<p>NULLP939 NULLP658 NULLP1144 NULLP1138 NULLP994 NULLP1164 NULLP1163 NULLP1123 NULLP1309 NULLP992 NULLP1122 NULLP1260 NULLP1215 NULLP1109 NULLP690 NULLP1165 NULLP1249 NULLP1274 NULLP1427 NULLP599 NULLP1252</p>	<p>M Harrison D Madew R Walker C Whitney D Webb R Lewis J Reynolds RI Evans Audley Community Action Group Alsager Town Council R Hopkins R Phillips J Phillips M Clewes C Gibson P Barber L Ford S Slaney M Kerr S Reeves C Halsall</p>
<p>Economic contribution of the site would be speculative / negative, dispute economic contribution from warehousing. No economic need for the site.</p>	<p>The Council acknowledges the concerns raised regarding the potential economic contribution of the proposed AB2 allocation. However, the Council considers that the development of this site for strategic employment uses will make a significant positive contribution to the local and sub-regional economy. The Strategic Employment Sites Assessment 2023 and 2024 (ED002 and ED002a), which forms part of the evidence base for the Local Plan, specifically assessed the economic case</p>	<p>No change required</p>	<p>NULLP382 NULLP158 NULLP356 NULLP470 NULLP443 NULLP561 NULLP359 NULLP692 NULLP833 NULLP477 NULLP706 NULLP825 NULLP517</p>	<p>Audley Rural Neighbourhood Plan Steering Group J Darlington K Hackforth DJ Thorley P Maddock E Harrison J Hackforth S Deacon S Thorington Audley Parish Council N Pustkowski T Thorrington Wright</p>

	<p>for the allocation of AB2. The assessment concluded that the site is commercially attractive and well-placed to meet the needs of businesses in growth sectors, including logistics and distribution. It identified a need for additional employment land to support the continued growth and diversification of the local economy, including the need for large, modern, high-quality employment sites that can accommodate a range of employment uses.</p> <p>The Assessment also noted the need to provide a greater choice in the local market and identified AB2 as being unique in terms of its size, location, and accessibility. The allocation of AB2 will help to address this need by providing a significant amount of new, high-quality employment land in a strategic location adjacent to Junction 16 of the M6 motorway. This will help to attract inward investment, create new jobs, and support the growth of existing businesses in the Borough. The development of AB2 is also expected to generate significant economic benefits for the wider sub-region, in line with the strategic objectives of the Local Plan and the economic growth priorities of the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP).</p>		<p>NULLP427 NULLP679 NULLP609 NULLP702 NULLP693 NULLP1027 NULLP1309 NULLP989 NULLP1427</p>	<p>R Poppleton A Kelter M Colclough M Johnson E Austin J Austin CPRE Staffordshire Audley Community Action Group J Johnson M Kerr</p>
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	<p>The Council recognises that there are differing views on the economic merits of warehousing and logistics development. However, the Council considers that this sector is an important part of the modern economy, providing a range of jobs and supporting the efficient movement of goods. The development of AB2 will help to ensure that the Borough is well-placed to benefit from the continued growth of this sector, providing high-quality employment opportunities for local people. The specific mix of employment uses on the site will be determined at the planning application stage, considering market demand and the need to create a balanced and sustainable employment offer.</p> <p>The Council is confident that the allocation of AB2 for strategic employment use is justified and will make a positive contribution to the local and sub-regional economy. The Council will work with the developer and other stakeholders to ensure that the development is brought forward in a timely and appropriate manner, and that any potential negative impacts are mitigated.</p>			
Allocation of this site is not justified by the Economic Needs Assessment Newcastle-under- Lyme & Stoke-on-Trent June 2020 which stated, 'overall need implied under any of	The Council acknowledges the commenter's reference to the 2020 Economic Needs Assessment (ENA) and its findings regarding employment land supply. However, it is important to note	No change required.	NULLP382	Audley Rural Neighbourhood Plan Steering Group

<p>the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This further highlights how the allocation of site AB2 would undermine regeneration elsewhere.</p>	<p>that both the Housing and Economic Development Needs Assessment (HEDNA) and the Strategic Employment Sites Assessment (SESA) have been updated in 2024 to reflect the most up-to-date evidence and projections. These updated assessments supersede the findings of the 2020 ENA and provide a more current and comprehensive understanding of employment land needs in the Borough.</p> <p>The 2024 HEDNA identifies a need for additional employment land to meet the future needs of the Borough, considering various factors such as projected job growth, sector trends, and the changing nature of the local economy. The updated SESA (2023 and 2024) specifically considers the suitability of the AB2 site for strategic employment use, considering its location, accessibility, and potential to attract inward investment. This assessment, alongside other evidence base documents, concluded that there is a need for additional employment land to meet the future needs of the Borough. Furthermore, it concluded that there is a shortage of large, high-quality, strategically located employment sites capable of meeting the needs of modern businesses, particularly in the logistics and distribution sector. The 2024 HEDNA</p>			
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	<p>also considered the need for employment land in the context of the wider Functional Economic Market Area (FEMA) and concluded that the allocation of AB2 would support the economic growth objectives of Newcastle-under-Lyme and the wider economic area.</p> <p>The Council believes that the allocation of AB2 is justified based on the findings of the updated evidence base and that it will make a significant contribution to meeting the employment needs of the Borough and the wider sub-region. The specific mix of employment uses on the site will be determined at the planning application stage, considering market demand and the need to create a balanced and sustainable employment offer. The Council is confident that the development of AB2 will not undermine regeneration efforts elsewhere in the Borough and will instead complement existing employment sites and support the overall economic growth and prosperity of the area.</p>			
Object to the loss of best and most versatile agricultural land	The Council acknowledges the concerns raised regarding the potential loss of best and most versatile agricultural land as a result of the proposed development at AB2. The Council confirms that the agricultural land quality of the site was considered as part of the site selection process, and that the allocation of the site for	No change required	NULLP382 NULLP81 NULLP115 NULLP170 NULLP114 NULLP118 NULLP283 NULLP457 NULLP470	Audley Rural Neighbourhood Plan Steering Group B Sutton K Barlow A Hughes A Barlow Mr and Mrs Pedley A Wood J Williams

	<p>strategic employment use reflects the outcome of this assessment. The Council recognises that the Borough contains significant areas of best and most versatile agricultural land, and that some loss of such land is unavoidable if the identified employment and housing needs of the Borough are to be met. The Council has sought to minimise the loss of best and most versatile agricultural land by prioritising the development of brownfield sites and directing development towards areas of lower agricultural land quality, where possible. However, the Council has also recognised the need to allocate greenfield sites in sustainable locations, in order to meet the identified need for new employment and housing development. In the case of AB2, the Council considers that the strategic importance of the site, in terms of its location adjacent to the M6 motorway and its potential to attract inward investment and create new jobs, outweighs the loss of agricultural land. The Council is confident that the proposed development can be delivered in a sustainable manner, and potential impacts on the agricultural value of the land can be mitigated through appropriate design and layout measures. Further details on the assessment of agricultural land quality</p>		<p>NULLP561 NULLP411 NULLP423 NULLP359 NULLP573 NULLP773 NULLP477 NULLP658 NULLP602 NULLP702 NULLP774 NULLP701 NULLP607 NULLP1123 NULLP992 NULLP1149 NULLP1165 NULLP1249 NULLP1252</p>	<p>DJ Thorley E Harrison E Howell K Edge J Hackforth P Cole R Page Audley Parish Council D Meadew A Williams E Austin D Page J Austin A Chatfield RI Evans Alsager Town Council T Barratt P Barber L Ford C Halsall</p>
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	and the consideration of alternative sites can be found in the Strategic Housing and Employment Land Availability Assessment (SHELAA) and the Site Selection Report which form part of the evidence base for the Local Plan.			
Object due to the impact upon the rural amenity / character due to scale	The Council acknowledges the comments made regarding the need for development at AB2 to be landscape-led, and to retain and enhance green infrastructure. The Council confirms that criterion 9 of Policy AB2 specifically requires the layout and development of the site to be landscape-led, and for green infrastructure to be retained and significantly enhanced across the site. This includes the retention and enhancement of mature trees and existing hedgerows, and the provision of a landscape buffer to the east and south of the site. These requirements are also reflected in Policy SE14: Green and Blue Infrastructure and supporting text, which sets out the Council's overall approach to green infrastructure provision in the Borough. The specific details of the landscaping scheme, including the design, layout, and planting of green infrastructure, will be determined at the planning application stage, considering the specific characteristics of the site and its surroundings.	No change required	NULLP382 NULLP170 NULLP118 NULLP453 NULLP356 NULLP359 NULLP662 NULLP773 NULLP824 NULLP682 NULLP939 NULLP1027 NULLP994 NULLP989 NULLP590	Audley Rural Neighbourhood Plan Steering Group A Hughes Mr and Mrs Pedley C Woodward K Hackforth J Hackforth C Bielby R Page A Timms B Smith M Harrison CPRE Staffordshire D Webb J Johnson E Stringer

Environmental and Wildlife Harm	The Council acknowledges the concerns regarding potential environmental and wildlife impacts from the development of AB2. The Council is committed to protecting and enhancing the Borough's biodiversity and natural environment. All development proposals for the site will be required to comply with relevant Local Plan policies, including Policy SE7 (Biodiversity Net Gain) and Policy SE8 (Biodiversity and Geodiversity). These policies require developments to achieve a net gain in biodiversity, protect designated sites and species, and incorporate appropriate mitigation measures. Furthermore, detailed ecological surveys and assessments will be required at the planning application stage to ensure that any potential impacts are fully understood and addressed through appropriate design and mitigation.	No change required	NULLP824 NULLP118 NULLP283 NULLP825 NULLP939 NULLP774 NULLP693 NULLP701 NULLP1027 NULLP1165 NULLP1252	A Timms Mr and Mrs Pedley A Wood T Thorrington Wright M Harrison D Page J Austin E Austin CPRE Staffordshire P Barber C Halsall
Heritage must be retained	The Council acknowledges the concerns raised regarding the potential impact of development on heritage assets at the AB2 site. The Council is committed to protecting and conserving the Borough's historic environment, as set out in Policy SE9: Historic Environment. Criterion 11 of Policy AB2 specifically requires the submission of a Heritage Impact Assessment (HIA) to assess the potential impacts on the setting of nearby heritage assets and to inform	No change required	NULLP1131	K Hoban

	<p>the layout and design of the development. This HIA will need to be prepared in accordance with relevant national and local guidance. Furthermore, criterion 12 requires the retention of known heritage assets within the footprint of the site and, where this is not possible, a programme of archaeological investigation, recording and mitigation. The Council will carefully consider the findings of the HIA and any recommendations for mitigation measures when determining any planning application for the site. The development will be expected to conserve and, where possible, enhance the significance of any affected heritage assets and their settings, in line with the requirements of Policy SE9.</p>			
<p>The plan allocates 80 hectares exceeding the 22 hectares required by 58 hectares using this Greenbelt land while 22 hectares of brownfield sites are available is unjustified and inflates housing needs</p>	<p>The Council has produced a clarification note in the submission documents in relation to the amount of employment land provided for by the site [ED039].</p>	<p>No change required</p>	<p>NULLP1157 NULLP1135 NULLP115 NULLP143 NULLP170 NULLP114 NULLP171 NULLP178 NULLP157 NULLP272 NULLP276 NULLP294 NULLP167 NULLP356 NULLP443</p>	<p>Cllr R Lewis Catherine Stratton K Barlow L Lycett A Hughes A Barlow G Newman D Beeston A Darlington B Harrison A Wood J Austin A Thys K Hackforth P Maddock</p>

			NULLP553 NULLP293 NULLP551 NULLP488 NULLP1032 NULLP904 NULLP359 NULLP852 NULLP573 NULLP427 NULLP469 NULLP1251 NULLP609 NULLP980 NULLP1156 NULLP994 NULLP1164 NULLP1151 NULLP1123 NULLP1208 NULLP1271 NULLP992 NULLP1149 NULLP989 NULLP1260 NULLP1215 NULLP1181 NULLP1140 NULLP1109 NULLP1165 NULLP1249 NULLP1290 NULLP1274 NULLP1213	F Horne J Austin J Brown R Carter J Gilmour R Nix J Hackforth K Cuthbert P Cole A Kelter P Ritchie J Moreau M Johnson J Farrington B Riley D Webb R Lewis M Montague Rl Evans D Spode J Gilmour Alsager Town Council T Barratt J Johnson Robert Phillips J Phillips D Grocott A Riley M Clewes P Barber L Ford S Adams S Slaney P Spode
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Uncertainty with HS2 funding and speculative development	<p>The Council acknowledges the concerns raised regarding the uncertainty surrounding HS2 and its potential implications for AB2. The Council also notes the comments regarding the speculative nature of the proposed development.</p> <p>The Council confirms that the allocation of AB2 for strategic employment use is not directly dependent on the delivery of HS2. The site's strategic location adjacent to Junction 16 of the M6 motorway, and its excellent access to the wider strategic road network, make it a highly attractive location for employment development, regardless of the future of HS2. This is evidenced in the Strategic Employment Sites Assessment (SESA) for the Local Plan. The SESA has identified a clear need for additional strategic employment land in the Borough and in the wider sub-region, and the Council is confident that there is sufficient market demand to support the development of this site. The site's location, size, and accessibility make it well-suited to a range of employment uses, including logistics, manufacturing, and other high-value sectors.</p> <p>The Council will continue to monitor market conditions and work closely with stakeholders to ensure that the development of AB2 is brought forward in a timely and appropriate manner.</p>	No change required	NULLP1157	Cllr R Lewis
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	The Council will also consider the need for any further review of the site allocation, in light of any significant changes to the economic or policy context, as part of the ongoing monitoring and review of the Local Plan.			
The exclusion of Chatterley Valley development is concerning.	The Council acknowledges the concerns raised regarding the treatment of Chatterley Valley in the Local Plan. While Chatterley Valley is not identified as a strategic employment site in the same way as AB2 or KL15, the Council recognises its importance to the local economy and its ongoing contribution to employment land supply in the Borough, as referenced in the Employment Land Topic Paper (ED032). The site continues to be identified within the Council's employment land supply figures and the allocation of BW1 (Land at Chatterley Valley, Lowlands Road) in the Local Plan will help to support and facilitate further employment development in this area, contributing towards a balanced portfolio of employment sites across the Borough. The Council considers this approach to be appropriate. It is also considered that the allocation of strategic sites such as AB2 will help to support a resilient supply of employment land both across the Borough and the wider sub-region, which may serve to improve the	No change required	NULLP1157 NULLP157 NULLP302 NULLP1501	Cllr R Lewis A Darlington J Austin Cllr D Jones Labour Group

	attractiveness of Chatterley Valley for future employment uses. The Council will continue to monitor the performance of Chatterley Valley and will work with landowners and developers to support appropriate development and investment in the area.			
There's no clear plan for road adoption and maintenance.	The Council acknowledges the concerns raised regarding the future adoption and maintenance of roads within the proposed AB2 development. The Council confirms that these matters will be considered in detail at the planning application stage and that any new roads within the development will be designed and constructed to an adoptable standard, in accordance with the requirements of the local highway authority, Staffordshire County Council. Policy AB2, criterion 2, requires the provision of safe and convenient access into the development, and criterion 13 specifically addresses the need for a comprehensive travel plan. These requirements, along with the broader requirements set out in Policy IN1: Infrastructure, Policy IN2: Transport and Accessibility, and Policy IN3: Access and Parking, will ensure that the new roads within the development are designed and built to a high standard and that they integrate effectively with the existing highway network. The provision of appropriate maintenance	No change required	NULLP1157	Cllr R Lewis

	and management arrangements for all new roads will also be a key consideration at the planning application stage. This may include the adoption of roads by the local highway authority, the establishment of a private management company, or other suitable arrangements. The Council will work closely with the developer, the local highway authority, and other relevant stakeholders to ensure that a clear and robust plan for road adoption and maintenance is in place before any development commences on site.			
The council's transport reports lack sufficient evidence.	The Council acknowledges the concerns raised regarding the evidence base underpinning the transport assessment for the proposed AB2 allocation. The Council considers that the Strategic Transport Assessment (STA), which forms part of the evidence base for the Local Plan, provides a robust and proportionate assessment of the potential transport impacts of the proposed development. The STA has been prepared in accordance with relevant national guidance and best practice and has been informed by detailed traffic modelling and analysis using the North Staffordshire Multi-Modal Model. The STA considers a range of factors, including the likely traffic generation associated with the proposed development, the capacity of	No change required	NULLP1157	Cllr R Lewis

	<p>the existing highway network, the potential for sustainable transport improvements, and the need for any necessary mitigation measures. The Strategic Transport Assessment concludes that the proposed development can be accommodated without resulting in severe residual cumulative impacts on the highway network, subject to the implementation of appropriate mitigation measures. These measures are outlined in the STA and are reflected in the policy requirements for AB2.</p> <p>The Council is committed to ensuring that all new development in the Borough is supported by appropriate transport infrastructure and that any potential impacts on the existing transport network are fully and appropriately mitigated. The Council will continue to work closely with the local highway authority, National Highways, and other relevant stakeholders to ensure that the transport impacts of the proposed development at AB2 are carefully considered and addressed through the planning application process.</p>			
Outcomes of the Green Belt Review (2024) have been ignored for the site.	The Council acknowledges the concerns raised regarding the allocation of AB2 and the loss of Green Belt land. The Council confirms that the decision to allocate this site for strategic employment use has been carefully	No change required	NULLP382 NULLP346	Audley Rural Neighbourhood Plan Steering Group D Foss

	<p>considered, considering the findings of the Green Belt Assessment (2004), which concluded that the site makes a moderate contribution to the overall purposes of the Green Belt. The Council recognises that the development of AB2 will result in the loss of some Green Belt land. However, the Council considers that there are exceptional circumstances that justify the release of this site from the Green Belt, as set out in Policy PSD5: Green Belt and its supporting text, and further detailed in the Plan Strategy Topic Paper (Employment).</p> <p>The exceptional circumstances in this case relate to the identified need for a large-scale strategic employment site in this location to meet the future economic needs of the Borough and the wider sub-region. The Strategic Employment Sites Assessment (SESA) has identified a shortfall in the supply of suitable employment land within the Borough, and the AB2 site is considered to be uniquely well-placed to meet this need due to its size, location, and accessibility. The Council's assessment has also concluded that there are no suitable alternative sites outside of the Green Belt that could accommodate the scale and type of development proposed for AB2.</p> <p>The Council has carefully considered the potential impacts of the</p>			
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	<p>development on the character and openness of the remaining Green Belt and has identified a number of mitigation measures that will be required to minimise these impacts, as set out in Policy AB2. These include the provision of a comprehensive landscaping scheme, the retention and enhancement of existing green infrastructure features, and the creation of new green infrastructure corridors to maintain connectivity with the wider countryside. The policy also requires the layout and development of the site to be landscape led and for new buildings or structures to be designed to ensure they are not intrusive in views from the surrounding area.</p> <p>The Council believes that the exceptional circumstances for Green Belt release, in combination with the proposed mitigation measures, justify the allocation of AB2 for strategic employment use. The Council is confident that the development can be delivered in a sensitive and sustainable manner, and that it will make a significant contribution to the economic growth and prosperity of the Borough.</p>			
Object to Loss of Green Belt land. The site makes a strong contribution to Green Belt.	The Council acknowledges the concerns raised regarding the allocation of AB2 and the loss of Green Belt land. The Council confirms that the contribution	No change required	NULLP382 NULLP62 NULLP66 NULLP81	Audley Rural Neighbourhood Plan Steering Group I Rowley

<p>Purposes and would undermine the purposes of the Green Belt. Green belt exceptional circumstances do not exist.</p>	<p>of the site to the purposes of the Green Belt has been carefully assessed through the Green Belt Assessment (2024), which concluded that the site makes a moderate overall contribution to the Green Belt purposes. The Council recognises that the development of AB2 will result in the loss of some Green Belt land. However, the Council considers that there are exceptional circumstances that justify the release of this site from the Green Belt. These exceptional circumstances, which are detailed in Policy PSD5: Green Belt and its supporting text, as well as in the Plan Strategy Topic Paper (Employment), relate to the identified need for a large-scale strategic employment site in this location to meet the future economic needs of the Borough and the wider sub-region. The Strategic Employment Sites Assessment (SESA) has identified a shortfall in the supply of suitable employment land within the Borough, and AB2 is considered to be uniquely well-placed to meet this need due to its size, location, and accessibility. The Council has also considered the potential impacts of the development on the character and openness of the remaining Green Belt and has identified a number of mitigation measures that will be required to minimise these impacts, as set out in Policy AB2. These</p>		<p>NULLP250 NULLP157 NULLP466 NULLP561 NULLP289 NULLP411 NULLP852 NULLP589 NULLP773 NULLP477 NULLP824 NULLP717 NULLP825 NULLP517 NULLP1251 NULLP702 NULLP774 NULLP288 NULLP824 NULLP693 NULLP1027 NULLP1138 NULLP1164 NULLP1123 NULLP1309 NULLP992 NULLP1122 NULLP590 NULLP1290 NULLP1274 NULLP1213 NULLP1427 NULLP599</p>	<p>Weston and Crewe Green Parish Council B Sutton N Ginnis A Darlington E Johnson E Harrison S Hough E Howell K Cuthbert The Barthomley Action Group R Page Audley Parish Council A Timms H Cunningham T Thorrington Wright R Poppleton J Moreau E Austin D Page A Hough A Timms J Austin CPRE Staffordshire C Whitney R Lewis RI Evans Audley Community Action Group Alsager Town Council R Hopkins E Stringer S Adams S Slaney P Spode M Kerr</p>
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	include the provision of a comprehensive landscaping scheme, the retention and enhancement of existing green infrastructure features, and the creation of new green infrastructure corridors to maintain connectivity with the wider countryside. The Council believes that the exceptional circumstances for Green Belt release, in combination with the proposed mitigation measures, justify the allocation of AB2 for strategic employment use. The Council is confident that the development can be delivered in a sensitive and sustainable manner, and that it will make a significant contribution to the economic growth and prosperity of the Borough.			S Reeves
Adverse impacts (visual, noise, light, disturbance, air quality)	<p>The Council acknowledges the concerns raised regarding the potential adverse impacts of development at AB2. The Council is committed to ensuring that all new development in the Borough is carried out in a sensitive and sustainable manner, with any potential negative impacts on the environment and local amenity mitigated as far as possible.</p> <p>Policy AB2 includes specific criteria to address these concerns. In particular:</p> <ul style="list-style-type: none"> • Criterion 8 requires a noise and air quality assessment and mitigation strategy to minimise impacts on the surrounding area. 	No change required.	NULLP382 NULLP66 NULLP115 NULLP1135 NULLP170 NULLP171 NULLP157 NULLP166 NULLP280 NULLP294 NULLP661 NULLP852 NULLP833 NULLP753 NULLP773 NULLP477	Audley Rural Neighbourhood Plan Steering Group Weston and Basford Parish Council K Barlow C Stratton A Hughes G Newman A Darlington J Burgess A Wood J Austin C Bielby K Cuthbert S Thorrington C Hoban R Page

	<ul style="list-style-type: none"> • Criterion 9 requires the layout and development of the site to be landscape-led, with buildings and structures designed to ensure they are not intrusive in significant views from the surrounding area. This criterion also requires the retention and significant enhancement of green infrastructure across the site. • Criterion 10 requires the retention and enhancement of mature trees and existing hedgerows, with minimal breaks to facilitate vehicular traffic, as well as the creation of new strong, defensible boundaries to the Green Belt. • Criterion 16 requires the provision of an integrated surface water drainage strategy to mitigate any impacts from surface water runoff. <p>In addition to these site-specific requirements, any future planning application for development at AB2 will need to comply with relevant policies in the Local Plan, including Policy SE1: Pollution and Air Quality, Policy SE3: Flood Risk Management, Policy SE4: Sustainable Drainage Systems, Policy SE10: Landscape, Policy SE11: Trees, Hedgerows and Woodland, and Policy SE12: Amenity. These policies collectively require development to avoid unacceptable adverse impacts on air quality, noise levels, light pollution, and other amenity considerations. They</p>		NULLP824 NULLP825 NULLP682 NULLP939 NULLP1027 NULLP992 NULLP1109 NULLP1274 NULLP1213 NULLP599	Audley Parish Council A Timms T Thorrington Wright B Smith M Harrison CPRE Staffordshire Alsager Town Council M Clewes S Slaney P Spode S Reeves
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	<p>also require appropriate mitigation measures to be implemented where necessary. The development will also be required to achieve Biodiversity Net Gain in accordance with Policy SE7 and will need to demonstrate how it will incorporate green infrastructure in line with Policy SE14.</p> <p>The specific details of these mitigation measures will be determined at the planning application stage, following detailed assessments and in consultation with relevant stakeholders. The Council will carefully consider these matters when determining any planning application for the site and will only permit development that is appropriately designed and mitigated to minimise any adverse impacts on the environment and local amenity.</p>			
Allocation of the site is contrary to the findings set out in relation to a number of topics in the sustainability appraisal	<p>The Council acknowledges the concerns raised regarding the findings of the Sustainability Appraisal (SA) in relation to the proposed allocation of AB2. The Council confirms that the SA, which forms part of the evidence base for the Local Plan, was carefully considered alongside all other relevant evidence, including the Strategic Employment Sites Assessment (SESA), the Green Belt Assessment, and the Transport Assessment, when making decisions on site allocations.</p>	No change required	NULLP382	Audley Rural Neighbourhood Plan Steering Group

	<p>The SA is a high-level assessment tool that is used to identify the potential social, economic, and environmental impacts of a range of policy options and site allocations. It is important to note that the SA is not the sole determinant of whether a site is suitable for allocation, and that it is one of a number of factors that must be considered when making planning decisions.</p> <p>The Council has carefully weighed potential positive and negative impacts of the site, alongside all other relevant considerations, and has concluded that the allocation of AB2 for strategic employment use is justified and appropriate. The reasons for this are set out in detail in the site allocation policy (Policy AB2), the supporting text, and the associated evidence base documents, including the Strategic Employment Sites Assessment (SESA). The Council is confident that any potential negative impacts associated with the development of AB2 can be adequately mitigated through the implementation of appropriate design and mitigation measures, as required by the policies of the Local Plan. These measures will be secured through the planning application process and will be informed by detailed technical assessments. The Council will work closely with the developer, statutory</p>			
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	consultees, and the local community to ensure that the development of AB2 is carried out in a sensitive and sustainable manner, and that any adverse impacts are minimised.			
<p>Cheshire East Council have raised objections regarding the site.</p> <ul style="list-style-type: none"> • Misalignment between housing and employment strategies • Case for strategic employment site • Site Specific comments 	A duty-to-co-operate statement of common ground has been agreed with Cheshire East which outlines areas of ongoing discussion on the comments raised at Regulation 19 stage.	No change required	<p>NULLP1027</p> <p>NULLP1275</p>	<p>CPRE Staffordshire</p> <p>Cheshire East Council</p>
<p>Tables N10 and N11 of the SA set out growth options. Option 6D does not include site AB2 and includes better outcomes.</p>	<p>The Council acknowledges the concerns raised regarding the Sustainability Appraisal (SA) and its assessment of different growth options. While the SA is a crucial part of the evidence base, it's important to understand that it's one element of a much wider assessment process. The SA's role is to assess the potential social, economic, and environmental impacts of different options, but it does not, in itself, determine which options should be taken forward. Other factors, including deliverability, viability, and strategic fit with the overall vision for the Borough, are also important considerations. The Council carefully considered all of the growth options assessed in the SA, including Option 6D, alongside other evidence. This included a detailed assessment of all potential employment</p>	No change required	<p>NULLP382</p> <p>NULLP346</p> <p>NULLP170</p> <p>NULLP1309</p>	<p>Audley Rural Neighbourhood Plan Steering Group</p> <p>D Foss</p> <p>A Hughes</p> <p>Audley Community Action Group</p>

	<p>sites, as set out in the Strategic Employment Sites Assessment (SESA) 2023 and 2024 (ED002 and ED002a). The SESA concluded that AB2 is a uniquely suitable site for large-scale strategic employment development, due to its location adjacent to the M6 motorway, its potential to attract inward investment, and its ability to deliver significant economic benefits to the Borough.</p> <p>The Council also considered the findings of the Green Belt Assessment (2024), which concluded that exceptional circumstances exist to justify the release of AB2 from the Green Belt. The Council acknowledges that the SA identified some potential negative environmental impacts associated with the development of AB2. However, the Council believes that these impacts can be adequately mitigated through the implementation of appropriate design and mitigation measures, as required by Policy AB2 and other relevant policies in the Local Plan. The Council also notes that the development of AB2 has the potential to deliver significant economic benefits, including the creation of new jobs and the attraction of inward investment. On balance, the Council considers that the benefits of allocating AB2 for strategic employment use outweigh any potential negative impacts, and</p>			
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	that the site is essential to delivering the overall economic growth strategy for the Borough. It is also noted that whilst the SA is an important document, it is for the Council to decide how much weight is to be attributed to the SA findings when compared to other relevant documents.			
N37 of the SA identify negative impacts of the site	Please see the Council response above in relation to the conclusions of the SA.	No change required	NULLP170 NULLP477 NULLP1309	A Hughes Audley Parish Council Audley Community Action Group
Concerns over impact on the landscape. The Newcastle-under-Lyme Landscape & Visual Appraisal March 2023 identifies the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development.	The Council acknowledges the concerns raised regarding the potential landscape and visual impacts of the proposed AB2 development. The Council recognises that the development will result in a change to the existing landscape character of the area, and that this change has been assessed as having a "major adverse impact" in the Landscape and Visual Appraisal (March 2023). However, it is important to note that the LVA is one of a number of evidence base documents that have informed the Council's decision to allocate AB2 for strategic employment use. The Council has also considered the findings of the Strategic Employment Sites Assessment (SESA), the Green Belt Assessment, and the Sustainability Appraisal, as well as the wider strategic objectives of the Local Plan, when making this decision.	No change required	NULLP382 NULLP66 NULLP477	Audley Rural Neighbourhood Plan Steering Group Weston and Crewe Green Parish Council Audley Parish Council

	<p>The Council believes that the exceptional circumstances for Green Belt release, as outlined in Policy PSD5: Green Belt and the supporting text, alongside the strategic economic benefits of the AB2 allocation, justify the development of this site, notwithstanding the identified landscape impacts. The Council has sought to minimise these impacts through the specific requirements set out in Policy AB2, particularly criterion 9, which requires the layout and development of the site to be landscape-led, with buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area. This policy also requires the retention and significant enhancement of green infrastructure across the site. Furthermore, criterion 10 requires the retention and enhancement of mature trees and existing hedgerows on the site and its boundaries and the creation of new strong, defensible boundaries to the Green Belt.</p> <p>The specific details of the landscaping scheme, including the provision of appropriate screening, planting, and other mitigation measures, will be developed at the planning application stage, considering the findings of the LVA and in consultation with relevant stakeholders. The Council will work</p>			
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	<p>with the developer to ensure that the development is designed and delivered in a sensitive manner, and that any adverse impacts on the landscape are minimised as far as possible. The Council also notes that criterion 9 requires the layout and development of the site to be landscape led, with buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area. Green Infrastructure should also be retained and significantly enhanced across the site. Criterion 10 also requires the retention and enhancement of mature trees and existing hedgerows on the site and its boundaries, with minimal breaks in hedgerows to facilitate vehicular traffic.</p>			
<p>The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identifies ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network.</p>	<p>The Council acknowledges the concerns raised regarding the potential impact of the proposed AB2 development on ecological and wildlife features, including the high distinctiveness wildlife corridor and strategically significant areas identified in the Audley Rural Civil Parish Natural Capital Assessment (Staffordshire Wildlife Trust, June 2024). The Council is committed to protecting and enhancing biodiversity within the Borough and recognises the importance of these features in contributing to the wider ecological network.</p>	No change required	<p>NULLP382 NULLP477</p>	<p>Audley Rural Neighbourhood Plan Steering Group Audley Parish Council</p>

	<p>The Council will work with the developer and relevant stakeholders, including Natural England and the Staffordshire Wildlife Trust, to ensure that any potential impacts on ecological and wildlife features are minimised and that the development delivers a net gain in biodiversity in accordance with Policy SE7: Biodiversity Net Gain, and criterion 9 of Policy AB2, which requires the retention and enhancement of on-site green infrastructure, including trees and hedgerows, as well as the provision of a comprehensive landscaping scheme.</p> <p>The Council will ensure that any future planning application for development on the AB2 site is accompanied by a comprehensive Ecological Impact Assessment, which will assess the potential impacts of the development on all relevant habitats and species, including those identified in the Natural Capital Assessment. The assessment will need to demonstrate how the proposed development will avoid, mitigate, or compensate for any potential impacts on ecological and wildlife features, in accordance with the mitigation hierarchy set out in the NPPF and Policy SE8: Biodiversity and Geodiversity.</p> <p>The Council is confident that, through careful planning and design, and the implementation of appropriate</p>			
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	mitigation measures, the proposed development at AB2 can be delivered in a manner that protects and enhances the ecological value of the site and contributes to the wider Nature Recovery Network. The specific details of these measures will be determined at the planning application stage, in consultation with relevant stakeholders and statutory consultees.			
The Strategic Housing & Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable & Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the Green Belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation.	The Council acknowledges the concerns raised regarding the previous assessment of AB2 within the SHELAA. The Council confirms that the SHELAA is regularly updated to reflect the latest available evidence and that the most recent version of the SHELAA, published alongside the Regulation 19 Local Plan, supersedes any previous iterations. It is important to note that the SHELAA is a technical assessment that informs the Local Plan process, but it is not the sole determinant of whether a site is suitable for allocation. The SHELAA forms part of the wider evidence base which is used to make judgements on whether a site is suitable to be allocated in the Local Plan. The Council has also considered a wide range of other factors, including the need to meet the Borough's objectively assessed housing and employment needs, the potential for the site to contribute to sustainable	No change required	NULLP382 NULLP346 NULLP170 NULLP477	Audley Rural Neighbourhood Plan Steering Group D Foss A Hughes Audley Parish Council

	<p>development, and the availability of alternative sites.</p> <p>Since the previous SHELAA assessment was undertaken, further technical work has been carried out in respect of highways and access, ecology, heritage, arboriculture, noise, landscape and visual impact and ground conditions. This further evidence has helped to address some of the earlier concerns about the site's suitability for development. The site is also no longer being considered for housing and is now being considered for employment use only. It is considered that this further assessment, alongside the production of the Green Belt Assessment (2024), has helped to inform the consideration of the exceptional circumstances required to justify the release of the site from the Green Belt.</p> <p>The Council has carefully considered all the available evidence and has concluded that the allocation of AB2 for strategic employment use is justified and necessary to meet the identified needs of the Borough and the wider sub-region. The Council is confident that any potential adverse impacts associated with the development of the site can be adequately mitigated through the detailed design and planning application process.</p>			
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Flood risk concerns.	<p>The Council acknowledges the concerns raised regarding flood risk at the AB2 site. The Council is committed to ensuring that all new development is safe from flooding and does not increase flood risk elsewhere, in accordance with the requirements of the NPPF and Policy SE3: Flood Risk Management.</p> <p>The Council confirms that a detailed Flood Risk Assessment (FRA) will be required as part of any future planning application for development on AB2. This assessment will need to consider all sources of flood risk, including fluvial, surface water, sewer, and groundwater flooding, and will need to consider the potential impacts of climate change. The FRA will also need to demonstrate that the proposed development will not increase flood risk elsewhere, and that any residual flood risk can be safely managed for the lifetime of the development.</p> <p>In addition to the FRA, the Council will require the submission of a comprehensive surface water drainage strategy, in accordance with Policy SE4: Sustainable Drainage Systems. This strategy will need to demonstrate that surface water runoff from the development will be managed in a sustainable manner, with no increase in runoff rates or volumes compared to the existing situation. The strategy will</p>	No change required	NULLP62 NULLP38 NULLP170 NULLP283 NULLP454 NULLP824 NULLP838	I Rowley K Barlow A Hughes A Wood S Livingston A Timms C Trenchard
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	<p>need to prioritise the use of sustainable drainage systems (SuDS) and incorporate appropriate measures to mitigate any potential impacts on water quality, in line with Policy SE5: Water Resources and Water Quality. The Council will expect the drainage strategy to be informed by detailed modelling and analysis of the site's hydrological characteristics, including any potential interactions with groundwater.</p> <p>The Council will work closely with the Environment Agency, the Lead Local Flood Authority, and other relevant stakeholders to ensure that the proposed development at AB2 is safe from flooding and does not increase flood risk elsewhere. The detailed design and layout of the development, including the provision of appropriate flood mitigation measures and drainage infrastructure, will be subject to further scrutiny at the planning application stage.</p>			
Carbon store and climate change impacts need to be considered.	The Council acknowledges the concerns raised regarding the potential climate change impacts of the proposed development at AB2. The Council is committed to addressing the challenges of climate change and promoting sustainable development, as set out in Policy CRE1: Climate Change and Policy CRE2: Renewable Energy.	No change required	NULLP62 NULLP423 NULLP477 NULLP774 NULLP283 NULLP692 NULLP477 NULLP706	I Rowley K Edge Audley Parish Council D Page A Wood S Deacon Audley Parish Council N Pustkowski

	<p>The Council recognises that the development of greenfield sites can result in the loss of existing carbon storage potential, particularly where development involves the removal of trees, hedgerows, and other vegetation. The Council will therefore require any future development proposals for AB2 to carefully consider the existing carbon storage capacity of the site and to incorporate measures to minimise any losses and maximise opportunities for carbon sequestration, in accordance with Policy SE14: Green and Blue Infrastructure. This could include, for example, the retention and enhancement of existing green infrastructure features, the planting of new trees and hedgerows, and the use of sustainable drainage systems that incorporate natural carbon storage solutions.</p> <p>Furthermore, the Council will expect all new development at AB2 to be designed and constructed to a high standard of sustainability, in line with the requirements set out in Policy CRE1. This includes minimising energy consumption, promoting the use of renewable and low carbon energy sources, and incorporating measures to reduce carbon emissions from transport. The policy also requires major developments to achieve at least BREEAM excellent standard and to</p>			
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	<p>provide an energy statement demonstrating how the development will meet the 10% energy generation requirement.</p> <p>The Council believes that the development of AB2 provides an opportunity to showcase best practice in sustainable design and construction, and to demonstrate how large-scale employment development can make a positive contribution towards achieving the Borough's climate change objectives and in line with the Climate Change Act 2008. The Council will work with the developer and other stakeholders to ensure that the development of AB2 incorporates appropriate measures to minimise its carbon footprint and to maximise its contribution to a low carbon future.</p>			
<p>The Strategic Employment Site Assessment - 2024 Update (Aspinall Verdi) has failed to deal with the previously highlighted contradiction with the ARUP and UVE Green Belt assessment reports.</p>	<p>The Council acknowledges the concerns raised regarding the allocation of AB2 and the potential impact on the Green Belt. The Council confirms that the Green Belt Assessment (2024) was a key piece of evidence that informed the site selection process and that the proposed allocation of AB2 has been carefully considered in light of this assessment's findings. The Council also confirms that it has considered all other relevant policy and guidance, including that set out within the NPPF.</p> <p>The Green Belt Assessment (2024) concluded that AB2 makes a moderate</p>	No change required	<p>NULLP346</p> <p>NULLP477</p> <p>NULLP1309</p>	<p>D Foss</p> <p>Audley Parish Council</p> <p>Audley Community Action Group</p>

	<p>overall contribution to the purposes of the Green Belt. The assessment also acknowledged that the site is not considered to be suitable for residential use and is completely detached from the nearest inset settlement of Audley. However, given the site's access to the strategic road network, the assessment concluded that the site may be suitable for employment use. The Council has considered this assessment alongside the findings of the Strategic Employment Sites Assessment (SESA), which identified a need for a large-scale strategic employment site in this location to meet the future economic needs of the Borough and the wider sub-region.</p> <p>The SESA concluded that there are no suitable alternative sites outside of the Green Belt that could accommodate the scale and type of development proposed for AB2. The Council has therefore determined that the exceptional circumstances required to justify the release of this site from the Green Belt have been demonstrated, in accordance with Policy PSD5: Green Belt, and that the allocation of AB2 for strategic employment use is justified and necessary to deliver the overall development strategy for the Borough. The Council has also considered the potential impacts of the development on the character and openness of the</p>			
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	<p>remaining Green Belt and has identified a number of mitigation measures that will be required to minimise these impacts, as set out in Policy AB2. The Council is confident that the allocation of AB2 for strategic employment use is justified and necessary, and that any potential impacts on the Green Belt can be adequately mitigated. The Council will continue to work with the developer, stakeholders, and the local community to ensure that the development is carried out in a sensitive and sustainable manner.</p>			
<p>Site variation AB2A is not mentioned in the Sustainability Appraisal.</p>	<p>The Council acknowledges the concerns raised regarding the reference to site variation AB2A and its absence from the Sustainability Appraisal. The Council confirms that site AB2, as allocated in the Local Plan, was the subject of a detailed assessment within the Sustainability Appraisal. The reference to AB2A was used within the Green Belt Assessment (2024) as part of the evidence base for the Local Plan, to differentiate between different parts of the overall AB2 site during the assessment process. The boundaries and extent of the AB2 site were refined through the plan making process and in response to the Green Belt Assessment. The AB2 site, as now defined in the Local Plan, is considered to be the most appropriate and sustainable location</p>	<p>No change required</p>	<p>NULLP346 NULLP477</p>	<p>D Foss Audley Parish Council</p>

	<p>for strategic employment development, considering all relevant environmental, social, and economic factors. The Sustainability Appraisal also considered the impact of the proposed development on the Green Belt, landscape character, and visual amenity, as well as other sustainability objectives. While site AB2A is not specifically referenced in the Sustainability Appraisal, the Council is confident that the assessment of the AB2 allocation, which now incorporates the area previously referred to as AB2A, is robust and comprehensive, and that the conclusions of the Sustainability Appraisal remain valid.</p>			
Infrastructure impacts / impacts on services of the site.	<p>The Council acknowledges the concerns raised regarding the potential impact of the AB2 development on local infrastructure and services. The Council is committed to ensuring that all new development in the Borough is supported by appropriate infrastructure and that existing services are not adversely affected. Policy AB2 sets out a number of specific requirements for the development of the site, including the provision of a new primary substation to support the additional demand for electricity, as well as sustainable drainage systems to manage surface water runoff. The policy also requires the preparation of a utilities management plan to ensure</p>	No change required	<p>NULLP132 NULLP170 NULLP118 NULLP359 NULLP663 NULLP852 NULLP662 NULLP773 NULLP907 NULLP1164 NULLP606</p>	<p>A Moody A Hughes Mr and Mrs Pedley J Hackforth M Bielby K Cuthbert C Bielby R Page R Taylor R Lewis J Heath</p>

	<p>that all necessary utilities are provided to serve the development.</p> <p>In addition to these site-specific requirements, the Council has undertaken a comprehensive assessment of the infrastructure needs associated with the Local Plan through the Infrastructure Delivery Plan (IDP). The IDP identifies the key infrastructure projects that will be required to support the planned growth in the Borough, including improvements to transport, utilities, education, healthcare, and other essential services.</p> <p>The Council will work closely with developers, infrastructure providers, and other stakeholders to ensure that the necessary infrastructure is delivered in a timely manner to support the development of AB2 and other allocated sites. This may include the use of planning obligations to secure financial contributions from developers towards infrastructure improvements, as well as direct provision of infrastructure on site.</p> <p>The Council is confident that, through careful planning and collaboration with relevant partners, the proposed development at AB2 can be delivered in a sustainable manner, without placing undue pressure on existing infrastructure and services. The detailed design and layout of the</p>			
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	development, including the provision of necessary infrastructure, will be subject to further scrutiny at the planning application stage.			
Construction impacts.	<p>The Council acknowledges the concerns raised regarding potential disruption during the construction phase of any development on AB2. While some level of disruption is unavoidable with any major construction project, the Council is committed to ensuring that this is kept to a minimum and that appropriate mitigation measures are put in place.</p> <p>All major development proposals for this site will be required to include a detailed Construction Management Plan (CMP) as part of any planning application, in accordance with Policy SE1 Pollution and Air Quality and supporting text. This plan will need to set out how the developer intends to minimise disruption to the local community and environment during the construction phase. This will include but not be limited to, measures to control noise, dust, vibration, and traffic impacts, as well as details of proposed working hours, site access arrangements, and the routing of construction vehicles. The CMP will also need to address any potential impacts on air quality, water quality, and biodiversity, and set out appropriate mitigation measures to address these</p>	No change required	NULLP170	A Hughes

	<p>impacts in accordance with Policies SE1, SE4, SE5 and SE7 of the Local Plan. The Council will carefully consider the content of the submitted CMP and will expect this to fully address all concerns raised in relation to potential construction impacts.</p> <p>The CMP will be subject to approval by the Council, and its implementation will be monitored throughout the construction phase. This will ensure that any disruption is kept to a minimum and that the development is carried out in a responsible and considerate manner. The Council will also work with developers and relevant stakeholders to ensure that the local community is kept informed of any potential disruptions and that any concerns are addressed promptly and effectively.</p>			
Object to loss of wildlife.	<p>The Council acknowledges the concerns raised regarding the potential impact of the proposed development on wildlife at AB2. The Council recognises the importance of protecting and enhancing the natural environment, as reflected in Policy SE7: Biodiversity Net Gain and Policy SE8: Biodiversity and Geodiversity, and the requirement for development proposals to deliver a measurable net gain in biodiversity. Any future planning application should be accompanied by an ecological</p>	No change required	NULLP411 NULLP477 NULLP706	E Howell Audley Parish Council N Pustkowski

	<p>assessment. This assessment will need to be carried out in accordance with best practice guidance and will be used to identify any potential impacts on protected species and habitats, and to inform appropriate mitigation and compensation measures. The ecological assessment will need to demonstrate that any proposed development will not result in any significant adverse impacts on European or UK protected species, or on the integrity of designated sites for nature conservation, including Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites.</p> <p>As part of the site allocation process, consideration has also been given to the potential impacts of development on the wider ecological network and green infrastructure corridors, and any future planning application will need to demonstrate how the proposed development will contribute to the enhancement of these assets in accordance with Policy SE14: Green and Blue Infrastructure and supporting text.</p> <p>The Council is committed to ensuring that all new development in the Borough contributes to a net gain in biodiversity, in line with the</p>			
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	<p>requirements of Policy SE7. The achievement of BNG will be a key consideration in the determination of planning applications, and developers will be expected to demonstrate how they have followed the biodiversity gain hierarchy.</p> <p>In the case of AB2, the Council acknowledges that future development may result in the loss of some existing habitats, including agricultural land and hedgerows. The Council considers, however, that the proposed development provides an opportunity to deliver significant ecological enhancements, both on and off-site, which will contribute towards achieving a net gain in biodiversity. These enhancements could include the creation of new habitats, such as species-rich grassland or native woodland planting, as well as the enhancement of existing habitats, such as hedgerows and watercourses.</p> <p>The Council will work with developers and relevant stakeholders, including Natural England, and the Staffordshire Wildlife Trust, to ensure that the proposed development at AB2 delivers a net gain in biodiversity and contributes to the wider ecological</p>			
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	network and green infrastructure objectives of the Local Plan. The Council will also seek to secure appropriate monitoring and management of the biodiversity enhancements, to ensure their long-term effectiveness.			
Object to loss of a greenfield site.	<p>The Council acknowledges the concerns raised regarding the use of greenfield sites for development. The Council has adopted a brownfield-first approach to site selection, prioritising the development of previously developed land within the urban area in the first instance, in line with the requirements of the NPPF. The council has concluded, however, that there is insufficient capacity on suitable brownfield sites to accommodate the entirety of the Borough's identified housing need over the plan period.</p> <p>The Council has undertaken a comprehensive site selection process, as outlined in the Site Selection Methodology Paper, which considered a wide range of factors, including the availability of suitable brownfield sites, environmental constraints, and the need to deliver sustainable development. This process has determined that the development of some greenfield sites is necessary to meet the identified housing requirement for the plan period, as set out in Policy PSD1: Overall Development Strategy.</p>	No change required	NULLP343 NULLP477	D O'Dwyer Audley Parish Council

	<p>The decision to allocate greenfield sites for development was not taken lightly and was only made after careful consideration of all other options. The Council is committed to ensuring that any development on greenfield land is undertaken in a sensitive and sustainable manner, with appropriate mitigation measures put in place to minimise any potential impacts on the environment, including biodiversity, landscape character, and the setting of heritage assets. The Council will continue to prioritise the development of suitable brownfield sites wherever possible and will work with developers to ensure that any new development on greenfield sites delivers a net gain in biodiversity, in accordance with Policy SE7: Biodiversity Net Gain.</p>			
<p>Clause 11, what specific mitigation measures in the Council's own HIA can be utilised here to ensure that harm to heritage assets will not occur and guide appropriate development at the planning application Clause 12, the development should ensure the retention of heritage assets on site. Additionally, based on the HIA findings an archaeological assessment will be required as the potential for archaeological remains is high. Separate the clause relating to retention of assets and</p>	<p>The Council acknowledges the concerns raised regarding the potential impact of AB2 on heritage assets and their settings. The Council is committed to protecting and conserving the historic environment of the Borough, as set out in Policy SE9: Historic Environment. Policy AB2, criterion 11, specifically requires the submission of a Heritage Impact Assessment (HIA) to demonstrate how the layout and design of the development will respond sensitively to the setting of nearby heritage assets.</p>	No change required	NULLP532	Historic England

<p>need for archaeological assessment.</p>	<p>The HIA will be required to identify and assess the significance of all heritage assets that may be affected by the development, including designated and non-designated assets, and their settings. It will also need to assess the potential impacts of the development on these assets, considering factors such as the scale, height, massing, and design of the proposed buildings, as well as any potential impacts on views and sightlines, and the visual amenity of the area. The HIA will need to identify and assess the significance of any known heritage assets on the site and recommend appropriate mitigation measures to ensure that harm to assets and their settings is avoided.</p> <p>In line with the mitigation hierarchy set out in Policy SE9, the HIA will need to demonstrate that all possible measures have been taken to avoid harm to heritage assets in the first instance. Where harm cannot be avoided, the HIA will need to set out appropriate mitigation measures to minimise the impact of the development on the significance of the affected assets. These measures could include, for example, adjustments to the layout, scale, or design of the development, the use of appropriate materials and building techniques, and the provision of landscaping or screening.</p>			
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	<p>In addition to the HIA, criterion 12 of Policy AB2 requires a programme of archaeological evaluation to be undertaken, including a field survey. This will help to determine the nature and extent of any archaeological remains on the site and inform the development of appropriate mitigation measures. The scope of this evaluation will be agreed with the Council, and the results will be used to inform the detailed design of the development. The Council considers that the requirement for a site specific HIA, along with the implementation of appropriate mitigation measures, will ensure that the development of AB2 does not result in unacceptable harm to heritage assets or their settings. The Council will work closely with the developer, Historic England, and other relevant stakeholders to ensure that the historic environment is appropriately considered and protected throughout the planning process. The Council also notes the suggestion to separate the clause relating to retention of assets and the need for archaeological assessment. However, it considers that the current policy wording, which addresses both issues within a single clause, is sufficiently clear and provides a coherent framework for the assessment and mitigation of impacts on heritage</p>			
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	assets. The supporting text to the policy provides further clarification on the specific requirements for archaeological assessment, and the Council is confident that these requirements will be fully addressed at the planning application stage.			
Site cannot be delivered in the Plan period.	<p>The Council acknowledges the concerns raised regarding the deliverability of the AB2 site within the plan period. However, the Council is confident that the site can be delivered within the plan period, based on the evidence available and the commitment from the site promoters to bring the site forward for development.</p> <p>The Strategic Employment Sites Assessment (SESA) has assessed AB2 as being deliverable and achievable for employment development within the plan period. The site is in a highly accessible location adjacent to the Strategic Road Network at Junction 16 of the M6 and the A500, which makes it attractive to potential occupiers and developers.</p> <p>Furthermore, the site promoters are a highly experienced and well-resourced developer with a proven track record of delivering employment sites across the UK. They have a strong commitment to bringing AB2 forward for development. The Council acknowledges that the delivery of any large-scale development site can be subject to a range of factors</p>	No change required	NULLP293 NULLP969 NULLP852 NULLP706 NULLP980	J Austin Keele Parish Council K Cuthbert N Pustkowski J Farrington

	that may affect the timing and phasing of development. However, the Council believes that AB2 has a number of key advantages that make it highly deliverable within the plan period, including its strategic location, the strong market demand for employment land in the area, and the commitment of the site promoters. The Council will continue to work closely with the site promoters and other stakeholders to ensure that the development of AB2 is brought forward in a timely and efficient manner, and that any potential barriers to delivery are addressed.			
Object to loss of hedgerows.	<p>The Council acknowledges the concerns raised regarding the potential impact of the development on hedgerows at AB2. The Council recognises the importance of hedgerows as valuable ecological and landscape features, providing habitat for wildlife, contributing to the character of the area, and helping to screen and integrate development into the landscape.</p> <p>Policy AB2, criterion 10, specifically requires the retention and enhancement of mature trees and existing hedgerows on the site and its boundaries, with minimal breaks in hedgerows to facilitate vehicular traffic. This policy also requires the strengthening of boundaries to the site, comprising landscape buffers and new areas of native woodland, and the</p>	No change required	NULLP411 NULLP706	E Howell N Pustkowski

	<p>creation of new strong, defensible boundaries to the Green Belt along the east and southern boundaries of the site. In addition, Policy SE11: Trees, Hedgerows and Woodland sets out the Council's overall approach to the protection and enhancement of these important landscape features.</p> <p>The Council will expect any future planning application for development at AB2 to be accompanied by a detailed assessment of the existing hedgerows on the site, including their ecological and landscape value. This assessment should identify any hedgerows that are considered to be 'important' under the Hedgerows Regulations 1997 and should set out a strategy for their retention and enhancement, where possible. Where the loss of hedgerows is unavoidable, the Council will require appropriate mitigation measures to be implemented, in accordance with the mitigation hierarchy set out in Policy SE8: Biodiversity and Geodiversity. This could include the provision of new hedgerow planting within the site, or off-site compensation measures where on-site mitigation is not feasible.</p> <p>The Council is committed to ensuring that the development of AB2 is carried out in a sensitive and sustainable manner, with due regard for the existing landscape features and ecological value of the site. The</p>			
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	detailed design and layout of the development will need to take account of the existing hedgerows and incorporate them into the overall landscaping scheme for the site, where possible. The Council will work closely with the developer and relevant stakeholders to ensure that any potential impacts on hedgerows are minimised and that appropriate mitigation measures are implemented.			
It is imperative that site promoters ensure that the points of connection for wastewater and clean water supply are agreed and to ensure that any necessary upgrades to infrastructure are coordinated with the delivery of development.	The Council thanks United Utilities for their comments in relation to the points of connection for waste and clean water supplies, the Plan will be amended to incorporate these suggestions.	Additional text has been proposed for inclusion in criteria 19 of the policy to reflect the comments made by United Utilities	NULLP1038	United Utilities
Alternative wording proposed for criterion 3 in regards the introduction of Park Mark Freight Scheme requirements.	The Council thanks Staffordshire Police for their comment in relation to criterion 3 of AB2, the Plan will be amended to incorporate this suggestion.	Additional text is added to criteria 3 in line with the comments made by Staffordshire Police	NULLP612	Staffordshire Police
Alternative wording suggested for a public transport strategy and references to travel plan.	The Council thanks Staffordshire County Council for their comment related to a public transport strategy and travel plan, the Plan will be amended to incorporate these suggestions.	Criteria 13 is proposed to be amended to refer to a public transport strategy	NULLP1085	Staffordshire County Council
No long-term management strategy.	The Council acknowledges the concerns raised regarding the need for a long-term management strategy for the proposed development at AB2. The	No change required	NULLP427	A Kelter

	<p>Council agrees that the long-term management and maintenance of landscaping, green infrastructure, and other environmental features is crucial to ensuring the successful integration of the development into its surroundings and to delivering the anticipated environmental benefits. Policy AB2, criterion 18, specifically requires the submission of a detailed management and maintenance plan for the site, addressing the ongoing maintenance of the public realm and the environment of the site. This plan will need to set out clear responsibilities for management and maintenance, as well as appropriate funding mechanisms to ensure that these responsibilities can be met over the long term.</p> <p>The Council will expect any future planning application for development of AB2 to be accompanied by a comprehensive management plan that demonstrates how the landscaping, green infrastructure, and other environmental features of the development will be managed and maintained in perpetuity. This plan will need to be prepared in consultation with relevant stakeholders and will need to be agreed with the Council. The management plan will need to cover a range of issues, including:</p>			
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	<ul style="list-style-type: none"> • The ongoing maintenance of all landscaped areas, including trees, hedgerows, and other planting. • The management of any water features or sustainable drainage systems (SuDS) on the site. • The maintenance of any ecological features or habitats provided as part of the development, including any biodiversity net gain enhancements. • The management of any public open space or recreational facilities provided as part of the development. • The maintenance of any features designed to mitigate the impact of the development on nearby heritage assets or their settings; and • The ongoing monitoring of the effectiveness of any mitigation measures implemented as part of the development. <p>The Council will work closely with the developer and relevant stakeholders to ensure that the management plan is robust, comprehensive, and deliverable, and that it secures the long-term management and maintenance of the site's key environmental features. The Council may use planning conditions or legal agreements to ensure the</p>			
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	implementation of the management plan, where appropriate.			
Heritage and Cultural Assets.	<p>The Council acknowledges the concerns raised regarding the potential impact of AB2 on heritage and cultural assets. The Council is committed to protecting and enhancing the historic environment of the Borough, as set out in Policy SE9: Historic Environment.</p> <p>Policy AB2 specifically addresses this issue through several criteria. Criterion 11 requires the submission of a Heritage Impact Assessment (HIA) to assess the potential impacts of the development on the setting of nearby heritage assets. This will inform the layout and design of the development. Criterion 12 requires the retention of any known heritage assets within the site, and where this is not possible, a programme of archaeological investigation, recording and mitigation.</p> <p>The Council recognises the importance of protecting and conserving heritage assets, both for their intrinsic value and for their contribution to the character and identity of the local area. The Council will work closely with the developer, Historic England, and other relevant stakeholders to ensure that the development of AB2 is carried out in a sensitive manner, and that any potential impacts on heritage assets are appropriately mitigated. The detailed design and layout of the development</p>	No change required	NULLP427	A Kelter

	will be subject to further scrutiny at the planning application stage, and the Council will use planning conditions and/or legal agreements to secure the implementation of any necessary mitigation measures.			
Support for AB2 – need for a large-scale strategic logistics focused employment development with access to the Strategic Road Network. Consider that exceptional circumstances exist for the allocation of the site.	The Council acknowledges Indurent Strategic Land Ltd.'s support for the AB2 allocation and their view that exceptional circumstances exist to justify its release from the Green Belt. The Council agrees that the site is well-placed to meet the identified need for strategic employment land and to support the economic growth objectives of the Local Plan, and the exceptional circumstances for the proposed release of land from the Green Belt in this location are set out in Policy PSD5: Green Belt, with details of the assessment provided in the Council's Green Belt Assessment (2024) and Employment Land Topic Paper.	No change required	NULLP988	Indurent Strategic Land
Evidenced demand for lorry parking - the September 2023 Lorry Parking Demand Assessment prepared by AECOM for National Highways identifies Newcastle-under-Lyme as the worst area in terms of unmet demand for lorry parking. The Local Plan must acknowledge and address this issue.	The Council acknowledges the evidence presented by Indurent Strategic Land Ltd. regarding the demand for lorry parking in the area, and specifically the findings of the AECOM Lorry Parking Demand Assessment. The Council recognises that the provision of adequate lorry parking facilities is an important consideration in the planning of new strategic employment sites, particularly those with a focus on	No change required	NULLP988	Indurent Strategic Land

	<p>logistics and distribution, such as is proposed at AB2.</p> <p>The Council confirms that the need for lorry parking has been carefully considered in the development of Policy AB2, and that criterion 3 of this policy specifically requires the provision of secure, high-quality Heavy Goods Vehicle (HGV) lorry parking with ancillary welfare and amenity facilities of an appropriate scale to serve the site. This requirement is in addition to the general requirements set out in Policy IN1: Infrastructure and Policy IN3: Access and Parking, which seek to ensure that all new development is supported by appropriate infrastructure and does not have an unacceptable impact on the local road network.</p> <p>The Council believes that the inclusion of this specific requirement within Policy AB2 demonstrates a clear commitment to addressing the identified need for lorry parking in the area and ensuring that the proposed development at AB2 makes appropriate provision for this essential infrastructure. The detailed design and layout of the lorry park, including the number of spaces, the type of facilities provided, and the management and operation arrangements, will be subject to further consideration at the planning application stage, in consultation with</p>			
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	National Highways and other relevant stakeholders. The Council is confident that, through the implementation of this policy requirement, the development of AB2 will help to address the identified shortfall in lorry parking provision and contribute to the safe and efficient operation of the strategic road network.			
Work undertaken on National Grid Electricity Distribution and positioning of sub-stations.	The Council acknowledges the comment by Indurent Strategic Land Ltd. in relation to National Grid electricity distribution and the positioning of sub-stations for the proposed AB2 development. The Council recognises the importance of ensuring that new development is supported by adequate utilities infrastructure, and that the provision of electricity is a key consideration in the planning of strategic employment sites. Policy AB2, criterion 4, specifically requires the provision of an on-site primary sub-station to support the delivery of the site, and/or provision of and implementation of a sustainable energy strategy to generate energy on site and minimise grid reliance. This demonstrates the Council's commitment to ensuring that the development has access to a secure and reliable electricity supply, and that the necessary infrastructure is in place to support its operation.	No change required	NULLP988	Indurent Strategic Land

	<p>Furthermore, Policy IN1: Infrastructure and Policy IN7: Utilities set out the broader policy framework for the provision of utilities infrastructure to support new development in the Borough. These policies require developers to work with utility providers to ensure that there is sufficient capacity to meet the needs of new development, and that any necessary upgrades or enhancements are delivered in a timely manner. The Council will continue to work closely with relevant stakeholders to ensure that the proposed development at AB2 is supported by robust and resilient utilities infrastructure. The specific details of the infrastructure provision, including the location and design of any new sub-stations, will be determined at the planning application stage, considering the technical requirements of the development and the need to minimise any potential impacts on the surrounding area.</p>			
Indurent also commissioned an industry leading expert in solar provision to complete a feasibility exercise on establishing the site as a truly integrated 'SMART Grid' with enhanced solar offering above their base specifications.	<p>The Council acknowledges the work undertaken by Indurent Strategic Land Ltd. to explore the feasibility of integrating SMART Grid technology and enhanced solar provision at the AB2 site. The Council welcomes this proactive approach to sustainable energy infrastructure, which aligns with the objectives of Policy CRE1: Climate Change and Policy CRE2: Renewable</p>	No change required	NULLP988	Indurent Strategic Land

	<p>Energy. These policies encourage all new development to incorporate renewable and low-carbon energy technologies, such as solar PV, to reduce carbon emissions and enhance energy efficiency.</p> <p>The Council is supportive of proposals that seek to maximise the use of on-site renewable energy generation and to integrate innovative technologies that can contribute to a more sustainable and resilient energy system. The specific details of the proposed SMART Grid and solar provision will be assessed at the planning application stage, considering the technical feasibility, viability, and potential impacts of these technologies. The Council will work with the developer and relevant stakeholders to ensure that any such proposals are appropriately integrated into the overall design and layout of the development, and that they contribute to the wider sustainability objectives of the Local Plan. This is reinforced through criterion 5 of Policy AB2 which specifically requires the site to provide for appropriate solar technology and investigate the potential for a 'smart' grid.</p>			
Indurent's base specification for strategic employment development of this type includes achieving BREEAM Excellent. Indurent also	The Council acknowledges Indurent Strategic Land Ltd.'s commitment to achieving a high standard of environmental performance, including	No change required	NULLP988	Indurent Strategic Land

commissioned the preparation of a strategy to understand how an uplift of BREEAM rating from Excellent towards Outstanding can be achieved.	<p>their intention to meet the BREEAM Excellent standard and explore opportunities for achieving an Outstanding rating. This approach aligns with the requirements of Policy AB2, which specifically states that employment units on the site should "achieve at least BREEAM excellent standard with an aim for the most recent BREEAM outstanding standard." The Council welcomes this commitment to sustainable design and construction, which will contribute to the overall objectives of the Local Plan in relation to climate change mitigation and adaptation, as set out in Policy CRE1: Climate Change. The Council will work with the developer to ensure that these aspirations are reflected in the detailed design and layout of the development, and that appropriate monitoring and verification procedures are in place to ensure that the proposed BREEAM standards are achieved.</p>			
"Traffic in Villages" approach, combined with the speed reduction and advanced signage measures to be delivered as part of the active travel strategy, further, to robustly deter scheme traffic using local roads.	<p>The Council acknowledges Indurent Strategic Land Ltd.'s proposed "Traffic in Villages" approach, including speed reduction and advanced signage measures, to deter scheme traffic from using local roads. The Council understands the concerns regarding the potential impact of development-related traffic on surrounding villages and the need to promote sustainable travel patterns. The Council welcomes</p>	No change required	NULLP988	Indurent Strategic Land

	<p>initiatives that seek to mitigate these impacts and will carefully consider the proposed measures as part of the detailed Transport Assessment required at the planning application stage, as outlined in Policy AB2 and Policy IN2: Transport and Accessibility. The effectiveness and appropriateness of these measures in the local context will be thoroughly assessed in consultation with the local highway authority, and any further measures or contributions that are necessary to improve accessibility and safety for all users will be identified through this process. The Council is committed to ensuring that the proposed development at AB2 integrates effectively with the existing transport network and does not have an unacceptable impact on the surrounding communities.</p>			
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76. Policy AB12 Land East of Diglake Street

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Access concerns Access on Diglake Street not appropriate Concerns over secondary access, emergency access	The access to the site from Diglake Street is considered suitable and supported by criteria requiring the provision of a suitable parking area for local residents and contributions towards off site highway improvements.	No change required	NULLP24 NULLP9 NULLP172 NULLP82 NULLP252 NULLP272 NULLP176 NULLP278 NULL177 NULLP274 NULLP550 NULLP275 NULLP498 NULLP556 NULLP295 NULLP555 NULLP421 NULLP333 NULLP451 NULLP552 NULLP756 NULLP500 NULLP455 NULLP350 NULLP604 NULLP902 NULLP995 NULLP444 NULLP908 NULLP675 NULLP597 NULLP680	M Dennis N Bailey G Newman W Potts N Ginnis B Harrison D Beeston A Wood D Beeston R Worrall J Brown C Worrall R Taylor F Horne J Austin S Harrison J Myatt K Edge RI Evans E Harrison C Hoban R Poppleton S Livingston M Allen J Heath R Nix D Webb P Maddock Protect Audley Parish Green Belt Group L Heath S Reeves

			NULLP1148 NULLP1248 NULLP813 NULLP778 NULLP574 NULLP1254 NULLP1253 NULLP1168 NULLP673 NULLP1423 NULLP1033 NULLP695 NULLP1120 NULLP1136 NULLP879 NULLP1291 NULLP1503	M Colclough A Godwin S Hopkins L Nelson D Page P Cole J Moreau J Gilmour P Barber L Heath M Kerr J Fraser C Gibson R Hopkins S Wykes J Evans S Adams C Nelson
Transport concerns – volume of cars and safety	The transport network has been considered through the Strategic Transport Assessment which has identified the mitigation measures required to be sought through the Plan.	No change required	NULLP39 NULLP110 NULLP284 NULLP153 NULLP421 NULLP451 NULLP552 NULLP500 NULLP471 NULLP452 NULLP455 NULLP597 NULLP1148 NULLP813 NULLP778 NULLP574 NULLP775	K Barlow Mr and Mrs Pedley A Wood L Owen J Myatt RI Evans E Harrison R Poppleton D Thorley C Woodward S Livingston S Reeves A Godwin L Nelson D Page P Cole R Page

			NULLP1254 NULLP1168 NULLP1033 NULLP695 NULLP1120 NULLP1159 NULLP1291 NULLP1503	J Moreau P Barber J Fraser C Gibson R Hopkins L Johnson S Adams C Nelson
Lack of bus service	The public transport links to rural centres has been considered through the rural topic paper.	No change required	NULLP39 NULLP756 NULLP1136 NULLP879	K Barlow C Hoban S Wykes J Evans
Concerns over impact on residents' car parking Lack of car parking in Audley	Criteria 3 includes the provision of a parking area for local residents to support the development.	No change required	NULLP24 NULLP172 NULLP144 NULLP149 NULLP176 NULLP153 NULLP556 NULLP552 NULLP908 NULLP675 NULLP597 NULLP605 NULLP1148 NULLP1248 NULLP813 NULLP778 NULLP574 NULLP775 NULLP1253 NULLP1168 NULLP1033 NULLP695 NULLP1120	M Dennis G Newman D Bagguley R Cooper D Beeston L Owen F Horne E Harrison Protect Audley Parish Green Belt Group L Heath S Reeves J Heath A Godwin S Hopkins L Nelson D Page P Cole R Page J Moreau P Barber J Fraser C Gibson

			NULLP1136 NULLP879 NULLP1216	R Hopkins S Wykes J Evans C Scott
Site AB75 (Land west of Bignall End Road) should be allocated to allow access from Great Oak Road	The site is an omission site and has been considered through the site selection report. The site is not considered suitable for development in this Local Plan.	No change required	NULLP1239	G Willard
Concern over loss of Green Belt	The Green Belt impacts have been considered through the Green Belt Assessment (part 4) and the site selection report. The exceptional circumstances case is set out in the Plan Strategy papers for housing.	No change required	NULLP24 NULLP9 NULLP252 NULLP275 NULLP556 NULLP555 NULLP421 NULLP333 NULLP451 NULLP552 NULLP452 NULLP455 NULLP448 NULLP678 NULLP444 NULLP912 NULLP718 NULLP676 NULLP827 NULLP908 NULLP1148 NULLP1248 NULLP778 NULLP775 NULLP1254 NULLP1168	M Dennis N Bailey N Ginnis C Worrall F Horne S Harrison J Myatt K Edge RI Evans E Harrison C Woodward S Livingston C Platt L Heath P Maddock Mrs Rhodes H Cunningham L Heath T Thorrington Wright Protect Audley Parish Green Belt Group A Godwin S Hopkins D Page R Page J Moreau

			NULLP1423 NULLP944 NULLP879 NULLP1115 NULLP1295 NULLP1291	P Barber M Kerr R McManus J Evans K Humphreys J Humphreys S Adams
Adverse impacts (visual, noise, light, disturbance, air quality)	As set out in Policy SA1 'general requirements' developments will be asked to undertake appropriate appraisals of impacts and consider amenity impacts of their proposals as required.	No change required	NULLP24 NULLP59 NULLP119 NULLP284 NULLP303 NULLP756 NULLP1148 NULLP695	M Dennis I Rowley Mr and Mrs Pedley A Wood J Austin C Hoban A Godwin C Gibson
Climate and carbon emission impact	Policy CRE1 climate change seeks to minimise the impacts of development on climate change.	No change required	NULLP24 NULLP284 NULLP775	M Dennis A Wood R Page
Landscape impacts	Policy criterion 4 requires the layout design and development of the site to be landscape led. Policy criterion 7 requires the retention of hedgerows and trees to retain the pattern of enclosure on the site.	No change required.	NULLP24 NULLP95 NULLP500	M Dennis W Barnish R Poppleton
Drainage, Flood, and flood risk impacts	Policy criteria 10&11 require the appropriate consideration of drainage and flood risk impacts of the site.	No change required	NULLP12 NULLP252 NULLP279 NULLP284 NULLP298 NULLP552 NULLP902 NULLP908 NULLP597 NULLP1248	M Dennis N Ginnis A Wood A Wood J Austin E Harrison R Nix Protect Audley Parish Green Belt Group S Reeves

			NULLP813 NULLP1254 NULLP1168 NULLP677 NULLP695 NULLP1136 NULLP1216 NULLP1291 NULLP1503	S Hopkins L Nelson J Moreau P Barber L Heath C Gibson S Wykes C Scott S Adams C Nelson
United Utilities alternative wording proposed	Criteria 11 notes that development should be located an appropriate distance from sewers. In respect of proposed change to paragraph 13.32, it is considered that the wording is sufficient, as drafted, to refer to the need for a drainage strategy and associated requirements.	No change required	NULLP1039	United Utilities
Increase demand for water and wastewater management	Criteria 10, 11, alongside 13.32 will consider the impacts of water and drainage on the site	No change required	NULLP17	M Dennis
Increased pressure on services and facilities	The Local Plan is supported by an infrastructure delivery plan which as identified the infrastructure required to support the allocations in the Local Plan. Policy AB12 requires contributions to improvements in the capacity of local schools / health facilities.	No change required	NULLP17 NULLP172 NULLP133 NULLP119 NULLP252 NULLP279 NULLP298 NULLP275 NULLP498 NULLP556 NULLP451 NULLP471	M Dennis G Newman A Moody Mr and Mrs Pedley N Ginnis A Wood J Austin C Worrall R Taylor F Horne RI Evans D Thorley

			NULLP350 NULLP678 NULLP902 NULLP912 NULLP827 NULLP606 NULLP597 NULLP680 NULLP1148 NULLP813 NULLP778 NULLP775 NULLP695 NULLP1136 NULLP1216 NULLP1115 NULLP1295 NULLP1185 NULLP1291 NULLP1503	M Allen L Heath R Nix Rhodes T Thorrington Wright J Heath S Reeves M Colclough A Godwin L Nelson D Page R Page C Gibson S Wykes C Scott K Humphreys J Humphreys D Grocott S Adams C Nelson
Brownfield sites should be used instead	In line with the NPPF, the Council has sought to find brownfield sites to meets its housing requirements first. Full details of how sites were assessed are in ED029 Site Selection Report and Assessments	No change required	NULLP59	I Rowley
Construction impacts	Policy SA1 general requirements, includes a construction management plan to set parameters around site construction.	No change required	NULLP59 NULLP604 NULLP673	I Rowley J Heath L Heath
Loss of Wildlife and Trees	Policy criterion 7 seeks to retain and enhance existing hedgerows and trees on the site.	No change required.	NULLP9 NULLP119 NULLP284 NULLP303	N Bailey Mr and Mrs Pedley A Wood J Austin

			NULLP555 NULLP813 NULLP778 NULLP1115 NULLP1295 NULLP1503	S Harrison L Nelson D Page K Humphreys J Humphreys C Nelson
Impacts on rural character / scale of proposal	Policy criterion 4 requires the layout, design, and development to be landscape led.	No change required	NULLP95 NULLP119 NULLP303 NULLP17 NULLP452 NULLP680 NULLP1148 NULLP778	W Barnish M Dennis J Austin Mr and Mrs Pedley C Woodward M Colclough A Godwin D Page
Support for AB12, submission of a masterplan in support of the proposal	Noted	No change required	NULLP84	Staffordshire County Council
Loss of agricultural land	The loss of best and most versatile land has been considered in the balance of allocating the site. A note has been prepared by the Council on the loss of best and most versatile land across the borough, compared to national levels.	No change required	NULLP284 NULLP550 NULLP303 NULLP555 NULLP451 NULLP552 NULLP471 NULLP908 NULLP1148 NULLP1248 NULLP1254 NULLP695 NULLP879 NULLP1216	A Wood J Brown J Austin S Harrison RI Evans E Harrison D Thorley Protect Audley Parish Green Belt Group A Godwin S Hopkins C Gibson J Evans C Scott
Site Selection Process, not consistent and therefore unsound	The site selection report has set out a transparent methodology to the selection of sites.	No change required.	NULLP333	K Edge

Impact on Wedgewood Monument	The allocation of the site is supported by a Heritage Impact Assessment which has considered impacts on such matters	No change required.	NULLP455	S Livingston
Pedestrian and cycle access through the adjacent park is a concern	The policy requires contributions towards adjacent play facilities (criterion 13)	No change required.	NULLP503	R Poppleton
Some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. Green Belt release should only occur in exceptional circumstances but accepts that there are no alternative sites that would not involve Green Belt release. The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education, and other facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.	Noted	No change required	NULLP382 NULLP478	Audley Rural Neighbourhood Plan Steering Group Audley Parish Council

77. Policy AB15 Land North of Vernon Avenue

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Traffic concerns, narrow access, and concerns over local road network	Policy criterion 2 confirms access to be taken via Vernon Avenue	No change required	NULLP120 NULLP40 NULLP134 NULLP150 NULLP154 NULLP173 NULLP472 NULLP1135 NULLP1338 NULLP818 NULLP696 NULLP598 NULLP834 NULLP509 NULLP830 NULLP600 NULLP910 NULLP1117 NULLP1301 NULLP996 NULLP699 NULLP603 NULLP1174 NULLP1292 NULLP1111 NULLP1154 NULLP1160 NULLP779 NULLP1188 NULLP1259 NULLP1339	Mr and Mrs Pedley K Barlow A Moody R Cooper L Owen G Newman M Ashmore Catherine Stratton L Warburton N Pustkowski C Gibson S Reeves S Thorrington R Poppleton RI Evans A Williams Protect Audley Parish Green Belt Group K Humphreys J Humphreys D Webb N Pustkowski J Williams P Barber S Adams M Clewes M Montague L Johnson D Page D Grocott J Gilmour L Warburton

Pressure on services and facilities	The Local Plan is supported by an infrastructure delivery plan. This has considered allocation AB15 and identified the need for financial contributions to the capacity of schools and health facilities	No change required.	NULLP120 NULLP134 NULLP277 NULLP96 NULLP173 NULLP285 NULLP304 NULLP445 NULL472 NULLP776 NULLP818 NULLP696 NULLP834 NULLP830 NULLP755 NULLP1117 NULLP1145 NULLP1301 NULLP996 NULLP699 NULLP828 NULLP1292 NULLP1111 NULLP1154 NULLP681 NULLP779 NULLP1188 NULLP1218	Mr and Mrs Pedley A Moody A Wood W Barnish G Newman A Wood J Austin P Maddock M Ashmore R Page N Pustkowski C Gibson S Thorrington RI Evans C Hoban K Humphreys R Walker J Humphreys D Webb N Pustkowski T Thorrington Wright S Adams M Clewes M Montague M Colclough D Page D Grocott C Scott
Impacts on wildlife and environment	Policy SA1, alongside the criteria in AB15 requires the appropriate consideration of biodiversity and wildlife impacts.	No change required	NULLP120 NULLP285 NULLP304 NULLP818 NULLP910 NULLP755 NULLP1117	Mr and Mrs Pedley A Wood J Austin N Pustkowski Protect Audley Green Belt Group C Hoban K Humphreys

			NULLP699 NULLP1218	N Pustkowski S Scott
Loss of village identify / character	The site requires the strengthening of boundaries and the maintenance of hedgerows. The layout and development of the site is expected to be landscape led.	No change required.	NULLP120 NULLP277 NULLP96 NULLP472 NULLP818 NULLP996 NULLP699 NULLP828 NULLP1292 NULLP1111 NULLP1154	Mr and Mrs Pedley A Wood W Barnish M Ashmore N Pustkowski D Webb N Pustkowski T Thorington Wright S Adams M Clewes M Montague
Loss of agricultural land	The loss of best and most versatile land has been considered in the balance of allocating the site. A note has been prepared by the Council on the loss of best and most versatile land across the borough, compared to national levels.	No change required	NULLP120 NULLP445 NULLP818 NULLP696 NULLP830 NULLP600 NULLP910 NULLP699 NULLP719 NULLP1255 NULLP1218	Mr and Mrs Pedley P Maddock N Pustkowski C Gibson RI Evans A Williams Protect Audley Green Belt Group N Pustkowski H Cunningham J Moreau C Scott
Amended criteria proposed for item 8 on sewers	The wording for criterion 6 is considered appropriate to respond to the comments from United Utilities	No change required	NULLP1040	United Utilities
Concern over Green Belt Impact / lack of exceptional circumstances for Green Belt release.	The Green Belt impacts have been considered through the Green Belt Assessment (part 4) and	No change required	NULLP60 NULLP449 NULLP445 NULLP472	I Rowley C Platt P Maddock M Ashmore

	the site selection report. The exceptional circumstances case is set out in the Plan Strategy papers for housing.		NULLP1135 NULLP776 NULLP818 NULLP830 NULLP910 NULLP942 NULLP755 NULLP1117 NULLP1301 NULLP699 NULLP719 NULLP1174 NULLP828 NULLP1111 NULLP1154 NULLP681 NULLP779 NULLP1259 NULLP1218	Catherine Stratton R Page N Pustkowski RI Evans Protect Audley Parish Green Belt Group R McManus C Hoban K Humphreys J Humphreys N Pustkowski H Cunningham P Barber T Thorrington Wright M Clewes M Montague M Colclough D Page J Gilmour C Scott
Concerns over flooding impacts. Local sewage works at capacity	The Local Plan is supported by a water cycle study which has assessed local sewage capacity. Paragraph 13.39 considers the sites response to flood risk and drainage requirements.	No change required	NULLP60 NULLP277 NULLP285 NULLP304 NULLP445 NULLP1135 NULLP818 NULLP696 NULLP600 NULLP910 NULLP699 NULLP719 NULLP1174 NULLP1154 NULLP1255	I Rowley A Wood A Wood J Austin P Maddock Catherine Stratton N Pustkowski C Gibson A Williams Protect Audley Green Belt Group N Pustkowski H Cunningham P Barber M Montague J Moreau

			NULLP1218	C Scott
Climate change impacts	Policy CRE1 Climate Change provides a policy context to minimise the climate change impacts of allocated sites in the Local Plan	No change required	NULLP60 NULLP445 NULLP755 NULLP1292 NULLP1111	I Rowley P Maddock C Hoban S Adams M Clewes
Poor public transport	The rural topic paper has considered public transport provision to Audley.	No change required	NULLP40 NULLP755	K Barlow C Hoban
Adverse impacts (visual, noise, light, disturbance, air quality)	Policy SA1 includes a section, environmental health, that considers the necessary assessments for impacts of noise, air quality and others	No change required	NULLP40 NULLP285 NULLP304	K Barlow A Wood J Austin
Support for the allocation. Objection to the reduction in overall number of the allocation from 40 to 33.	Noted	No change required	NULLP368	N Holland
The site will provide for unaffordable homes	The site will provide for affordable homes in line with the policy approach in the Local Plan	No change required	NULLP1145	R Walker
Impact on local heritage	Criteria 7&8 of the site policy consider, amongst other things, the need for a heritage impact assessment to consider any impacts on heritage assets.	No change required	NULLP1111	M Clewes

<p>Some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. Green Belt release should only occur in exceptional circumstances but accepts that there are no alternative sites that would not involve Green Belt release. The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education, and other facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.</p>	Noted	None Required	NULLP382	<p>Audley Rural Neighbourhood Plan Steering Group Audley Parish Council</p>
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78. Policy AB33 Land Off Nantwich Road / Park Lane, Audley

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Traffic concerns (including access / safety / congestion, parking concerns).	Criteria 2 confirms the access into the site. The strategic transport assessment has considered implications on the wider network and identified mitigation measures, as appropriate	No change required	NULLP121 NULLP61 NULLP41 NULLP135 NULLP286 NULLP168 NULLP151 NULLP155 NULLP476 NULLP301 NULLP446 NULLP754 NULLP1028 NULLP997 NULLP720 NULLP503 NULLP777 NULLP587 NULLP993 NULLP572 NULLP694 NULLP780 NULLP588 NULLP601 NULLP1264 NULLP1116 NULLP659 NULLP1152 NULLP1250 NULLP1146 NULLP1177	Mr and Mrs Pedley I Rowley K Barlow A Moody A Wood A Thys R Cooper L Owen M Ashmore J Austin P Maddock C Hoban J Gilmour D Webb H Cunningham R Poppleton R Page T Lovatt RI Evans S Deacon C Gibson D Page M Lovatt A Williams J Gilmour K Humphreys D Madew B Riley S Hopkins R Walker P Barber

			NULLP703 NULLP915 NULLP1112 NULLP803 NULLP837 NULLP1162 NULLP1161 NULLP1183 NULLP1217 NULLP1303	N Pustkowski Mrs Rhodes M Clewes M Colclough C Trenchard A Riley L Johnson D Grocott C Scott J Humphreys
Pressure on services and facilities	The Local Plan is supported by an infrastructure delivery plan which considers the impacts of the Local Plan proposals on infrastructure in the Borough. In respect of site AB33, it identifies that contributions are required to improvements to local schools and health facilities.	No change required	NULLP121 NULLP97 NULLP135 NULLP282 / 286 NULLP168 NULLP567 NULLP300 NULLP476 NULLP301 NULLP446 NULLP1028 NULLP997 NULLP720 NULLP829 NULLP587 NULLP993 NULLP572 NULLP694 NULLP780 NULLP943 NULLP588 NULLP1116 NULLP1146 NULLP703 NULLP915	Mr and Mrs Pedley W Barnish A Moody A Wood A Thys F Horne J Austin M Ashmore J Austin P Maddock J Gilmour D Webb H Cunningham T Thorrington Wright T Lovatt RI Evans S Deacon C Gibson D Page R McManus M Lovatt K Humphreys R Walker N Pustkowski Mrs Rhodes

			NULLP911 NULLP1112 NULLP803 NULLP1162 NULLP1217 NULLP1303 NULLP1155	Protect Audley Parish Green Belt Group M Clewes M Colclough A Riley C Scott J Humphreys M Montague
Impacts on wildlife and environment	Policy SA1, alongside the criteria in AB33 requires the appropriate consideration of biodiversity and wildlife impacts.	No change required	NULLP121 NULLP286 NULLP301 NULLP754 NULLP777 NULLP703 NULLP915 NULLP1121	Mr and Mrs Pedley A Wood J Austin C Hoban R Page N Pustkowski Mrs Rhodes R Hopkins
Loss of village identify / character	The layout and development of the site is expected to be landscape led		NULLP121 NULLP61 NULLP97 NULLP155 NULLP997 NULLP829 NULLP503 NULLP777 NULLP703 NULLP1293 NULLP1112	Mr and Mrs Pedley I Rowley W Barnish L Owen D Webb T Thorrington Wright R Poppleton R Page N Pustkowski S Adams M Clewes
Loss of agricultural land	The loss of best and most versatile land has been considered in the balance of allocating the site. A note has been prepared by the Council on the loss of best and most versatile land across the borough, compared to national levels.		NULLP121 NULLP97 NULLP282 / 286 NULLP168 NULLP300 NULLP301 NULLP446	Mr and Mrs Pedley W Barnish A Wood A Thys J Austin J Austin P Maddock

			NULLP1028 NULLP720 NULLP587 NULLP993 NULLP572 NULLP721 NULLP694 NULLP1256 NULLP588 NULLP601 NULLP659 NULLP1177 NULLP703 NULLP911 NULLP803	J Gilmour H Cunningham T Lovatt RI Evans S Deacon H Cunningham C Gibson J Moreau M Lovatt A Williams D Madew P Barber N Pustkowski Protect Audley Parish Green Belt Group M Colclough
Concern over Green Belt Impact The site makes contribution to Green Belt	The Green Belt impacts have been considered through the Green Belt Assessment (part 4) and the site selection report. The exceptional circumstances case is set out in the Plan Strategy papers for housing.	No change required	NULLP121 NULLP61 NULLP41 NULLP567 NULLP476 NULLP450 NULLP446 NULLP754 NULLP1028 NULLP829 NULLP503 NULLP777 NULLP993 NULLP721 NULLP780 NULLP1256 NULLP943 NULLP588 NULLP1264	Mr and Mrs Pedley I Rowley K Barlow F Horne M Ashmore C Platt P Maddock C Hoban J Gilmour T Thorington Wright R Poppleton R Page RI Evans H Cunningham D Page J Moreau R McManus M Lovatt J Gilmour

			NULLP1116 NULLP1177 NULLP703 NULLP1293 NULLP1112 NULLP803 NULLP1217 NULLP1303 NULLP1155	K Humphreys P Barber N Pustkowski S Adams M Clewes M Colclough C Scott J Humphreys M Montague
Climate change impacts	Policy CRE1 Climate Change provides a policy context to minimise the climate change impacts of allocated sites in the Local Plan	No change required	NULLP61 NULLP286 NULLP301 NULLP993 NULLP780 NULLP703	I Rowley A Wood J Austin RI Evans D Page N Pustkowski
Concern over flood risk, drainage, water supply	Criteria 7&8 seek to mitigate for any flood risk, including surface water flooding.	No change required	NULLP61 NULLP282 / 286 NULLP300 NULLP301 NULLP446 NULLP1028 NULLP720 NULLP587 NULLP993 NULLP572 NULLP721 NULLP694 NULLP1256 NULLP588 NULLP1264 NULLP659 NULLP1152 NULLP1250 NULLP1293 NULLP911	I Rowley A Wood J Austin J Austin P Maddock J Gilmour H Cunningham T Lovatt RI Evans S Deacon H Cunningham C Gibson J Moreau M Lovatt J Gilmour D Madew B Riley S Hopkins S Adams

			NULLP1162 NULLP1217	Protect Audley Parish Green Belt Group A Riley C Scott
Criterion 7 should be amended	The wording for criterion 7 is considered appropriate to respond to the comments from United Utilities	No change required	NULLP1041	United Utilities
Poor public transport service	Public transport provision in Audley is considered in the rural topic paper	No change required	NULLP41 NULLP694	K Barlow C Gibson
Adverse impacts (visual, noise, light, disturbance, air quality)	Policy SA1 includes a section, environmental health, that considers the necessary assessments for impacts of noise, air quality and others.	No change required	NULLP41 NULLP121 NULLP286 NULLP168 NULLP301 NULLP754 NULLP694	K Barlow Mr and Mrs Pedley A Wood A Thys J Austin C Hoban C Gibson
Support for the allocation of the site and masterplan information	Noted	No change required	NULLP85	Staffordshire County Council
Concerns over impacts upon landscape	Criterion 4 requires the layout of the development being landscape led.	No change required	NULLP97 NULLP503	W Barnish R Poppleton
Concerns over construction impacts of the site	Policy requires a construction management plan to consider the parameters of the construction process	No change required	NULLP446	P Maddock
Concerns over topography of the site and accessibility to services	The site is in proximity to the village to access essential services and facilities	No change required	NULLP1028 NULLP911 NULLP1217	J Gilmour Protect Audley Parish Green Belt Group C Scott
Site AB32 should be included in the Plan as the site was included in the First Draft Local Plan Stage.	Site AB32 has been considered through the site selection report and is considered to not be suitable for allocation in this Local Plan	No change required	NULLP924	V Malkin

<p>Some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. Green Belt release should only occur in exceptional circumstances but accepts that there are no alternative sites that would not involve Green Belt release. The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education, and other facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.</p>	Noted	None Required	<p>NULLP382 NULLP481</p>	<p>Audley Rural Neighbourhood Plan Steering Group Audley Parish Council</p>
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79. Bradwell

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

80. Policy BW1 Chatterley Valley, Lowlands Road

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Surprise that Chatterley Valley has not been given greater prominence as a strategic employment site, owing to the considerable public investment that has taken place. The area includes brownfield land & has the potential to attract firms specialising in green technology & alleviate development pressures on the Green Belt.	Noted. Issues of employment land supply, including the contribution Chatterley Valley makes, are detailed as part of ED001 Housing & Economic Need Assessment 2024.	No change required	NULLP640	Cross Heath, Wolstanton & May Bank Branch Labour Party (R Gorton)
Impact negatively on Green Belt land & biodiversity. Areas role in alleviating climate change, noise & air pollution as well we as its recreational value.	Noted. Biodiversity net gain is a key component of the Local Plan as detailed in Policy SE7, with Policy SA1 setting the general requirements to be considered (as appropriate) in the bringing forward of sites, alongside the site-specific aspects elucidated in BW1.	No change required	NULLP757	C Hoban

81. Crackley and Red Street

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

82. Policy CT1 Land at Red Street and High Carr Farm

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Notes discrepancy between CT1A label in Site Review and CT1 in Local Plan.	The Council acknowledges the discrepancy between the use of "CT1A" in the Site Review and "CT1" in the Local Plan to refer to the allocated site at Red Street and High Carr Farm. The Council confirms that this has been corrected in the final version of the Local Plan. The Council apologises for any confusion caused by this. For further details on the rationale for this allocation, please refer to the supporting evidence base for CT1.	No change required	NULLP131 NULLP142 NULLP137 NULLP138 NULLP182 NULLP180 NULLP184 NULLP183 NULLP185 NULLP186 NULLP187 NULLP1505 NULLP189 NULLP190 NULLP191 NULLP192 NULLP193 NULLP237 NULLP1486 NULLP1465 NULLP194 NULLP1402 NULLP1404 NULLP1401 NULLP1399 NULLP1400 NULLP1403 NULLP1313 NULLP1226	G Wilding M Thorpe D Payne L Dowling D Hall S Heinsohn P Harrison P Lamb R Kent J Tidyman S George A Wright G Bromley K Palmer J Slater D Barlow D Evans S Smith D Lench J Ratcliffe C Hall R Medlock I McMillan S Colclough J Harding R Owen S Medlock S Davies A Hardstaff

			NULLP1142	J Hardstaff
			NULLP1425	A Johnson
			NULLP1428	P Wright
			NULLP1429	P Smith
			NULLP1431	S Andrzejewski
			NULLP1439	N Davies
			NULLP1456	T Sherwood
			NULLP1406	B Ottley
			NULLP1414	A Smith
			NULLP1412	J Brennan
			NULLP1413	P Brennan
			NULLP1415	A Wilkes
			NULLP1410	S Edwards
			NULLP1444	G Baddeley
			NULLP1446	C Findler
			NULLP1450	T Blairs
			NULLP1454	V Hood
			NULLP1459	Mr and Mrs Zwetschnikow
			NULLP1408	G Walsh
			NULLP1445	F Hollingsworth
			NULLP1411	G Round
			NULLP1453	M Marsh
			NULLP1449	MS Handley
			NULLP1460	M Mountford
			NULLP1418	J Rigby
			NULLP1409	P Wright
			NULLP1440	L Davies
			NULLP1405	A McMillan
			NULLP1407	D Ottley
			NULLP1426	D Williams
			NULLP1424	K Mayer
			NULLP1417	D Everall
			NULLP1461	M Halliday
			NULLP1441	P Brennan

			NULLP1436 NULLP1433 NULLP1420 NULLP1432 NULLP1419 NULLP1416 NULLP1462 NULLP1222 NULLP1236 NULLP1476 NULLP1220 NULLP592 NULLP596 NULLP1448 NULLP1443 NULLP1452 NULLP1470 NULLP1467 NULLP1483 NULLP1477 NULLP1484 NULLP1489 NULLP1492 NULLP1490 NULLP1438 NULLP1494 NULLP1474 NULLP1472 NULLP1458 NULLP1435 NULLP1422	J and C Williams T Bostock G Carr A Tizley R William Davies D Gill L Millward E Bull P Bull N Bull L Foster A Flanagan R Smith S Moore D Humphries S Faint D Hackett J Hansell P Lambert J Hackett J Lambert D Paxton-Moore G Faint S Paxton-Moore P Hood R Lewis L Wilkes C Richmond D Pegg J Moore C Quinn
Loss of Greenbelt / justification for loss of Green Belt.	The Council acknowledges the concerns raised regarding the allocation of CT1 and the potential impact this may have on land currently designated as Green Belt. The release of this land has been	No change required	NULLP131 NULLP142 NULLP138 NULLP182	G Wilding M Thorpe L Dowling D Hall

	<p>carefully considered and justified by exceptional circumstances, consistent with the NPPF. This included assessing the site's contribution to Green Belt purposes and balancing housing need with potential harm. The exceptional circumstances case for Green Belt release is detailed in the Plan Strategy Housing Paper (ED031). This identifies the need to meet objectively assessed housing needs within the borough, including affordable housing, and sets out why these needs cannot be met solely on non-Green Belt land. The assessment of potential sites, as documented in the evidence base, concluded that some limited Green Belt release is necessary to deliver the required housing numbers and achieve a sustainable pattern of development. Furthermore, the identified harm arising from the development of this site is considered limited. The Council will ensure that any development on this site is subject to high-quality design and landscaping requirements, as outlined in Policy PSD7 (Design), to minimise any adverse impacts on the character of the surrounding area. The Council also recognises the importance of protecting biodiversity and ecological value, as highlighted in Policy SE7 (Biodiversity Net Gain) and Policy SE8 (Biodiversity and Geodiversity) and will ensure that any development on this site delivers a net gain in biodiversity. As such, the Council considers that the allocation of this site for development is justified, and that any potential harm is outweighed by the benefits of meeting local housing needs.</p>		<p>NULLP184 NULLP185 NULLP180 NULLP137 NULLP186 NULLP1505 NULLP192 NULLP183 NULLP237 NULLP1465 NULLP1436 NULLP194 NULLP187 NULLP1401 NULLP1313 NULLP1226 NULLP1425 NULLP1431 NULLP1446 NULLP1408 NULLP1445 NULLP1411 NULLP1409 NULLP1405 NULLP1407 NULLP1432 NULLP1477 NULLP758 NULLP592 NULLP1453 NULLP1399 NULLP1484 NULLP1418 NULLP1142 NULLP1404</p>	<p>P Harrison R Kent S Heinsohn D Payne J Tidyman A Wright D Barlow P Lamb S Smith J Ratcliffe J and C Williams C Hall S George S Colclough S Davies A Hardstaff A Johnson S Andrzejewski C Findler G Walsh F Hollingsworth G Round P Wright A McMillan D Ottley A Tizley J Hackett C Hoban A Flanagan M Marsh J Harding J Lambert J Rigby J Hardstaff I McMillan</p>
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			NULLP1420	G Carr
			NULLP1460	M Mountford
			NULLP1417	D Everall
			NULLP1402	R Medlock
			NULLP1403	S Medlock
			NULLP1433	T Bostock
			NULLP1400	R Owen
			NULLP1472	C Richmond
			NULLP1410	S Edwards
			NULLP1450	T Blairs
			NULLP1486	D Lench
			NULLP1490	S Paxton-Moore
			NULLP1415	A Wilkes
			NULLP1419	R William Davies
			NULLP1439	N Davies
			NULLP1462	L Millward
			NULLP1422	C Quinn
			NULLP1443	D Humphries
			NULLP1467	J Hansell
			NULLP1492	G Faint
			NULLP1426	D Williams
			NULLP1143	J Hardstaff
			NULLP1470	D Hackett
			NULLP1416	D Gill
			NULLP1440	L Davies
			NULLP1456	T Sherwood
			NULLP1424	K Mayer
			NULLP1448	S Moore
			NULLP1452	D Pegg
			NULLP1412	S Faint
			NULLP1458	J Brennan
			NULLP1489	D Paxton-Moore
			NULLP189	G Bromley
			NULLP307	J Austin
			NULLP596	R Smith

			NULLP190 NULLP191 NULLP193 NULLP1428 NULLP1429 NULLP1406 NULLP1414 NULLP1413 NULLP1444 NULLP1454 NULLP1449 NULLP1461 NULLP1459 NULLP1222 NULLP1236 NULLP1476 NULLP1220 NULLP1463 NULLP1483 NULLP1494 NULLP1474 NULLP1435	K Palmer J Slater D Evans P Wright P Smith B Ottley A Smith P Brennan G Baddeley V Hood MS Handley M Halliday Mr and Mrs Zwetschnikow E Bull P Bull N Bull L Foster A Pegg P Lambert P Hood R Lewis L Wilkes J Moore
Concerns around historic mining.	<p>The Council acknowledges the concerns raised regarding the legacy of historical mining in the area, particularly the presence of former mine workings associated with the Talke O’ The Hill Colliery and the potential for ground instability. The Council confirms that any planning application for development on CT1 will be required to undertake and submit a detailed Coal Mining Risk Assessment and mitigation strategy in accordance with Policy CT1. This assessment will need to comprehensively evaluate any risks associated</p>	No change required	NULLP131 NULLP98 NULLP184 NULLP186 NULLP1505 NULLP190 NULLP142 NULLP138 NULLP182 NULLP185 NULLP180	G Wilding C Hulse P Harrison J Tidyman A Wright K Palmer M Thorpe L Dowling D Hall R Kent S Heinsohn

	<p>with former mining activity, including the presence of mine shafts, shallow coal workings, and any geological fault lines, and to propose appropriate mitigation measures. The assessment will need to demonstrate to the satisfaction of the Local Planning Authority, in consultation with the Coal Authority, that any identified risks can be effectively addressed and that the site can be made safe and stable for development. The specific details of these mitigation measures, which may include, but are not limited to, ground investigation works, grouting or compaction, and appropriate foundation design, will be determined at the planning application stage. It is noted that existing properties in the vicinity of the site have been subject to remedial works such as pinning and bracing in the past, and any future development proposals will need to take account of the existing ground conditions and the potential for cumulative impacts on nearby properties. The Council is committed to ensuring that any new development in the area is safe, stable, and does not pose an unacceptable risk to human health or the environment, and the submission and approval of a robust Coal Mining Risk Assessment will be essential to achieving this objective.</p>		<p>NULLP137 NULLP192 NULLP183 NULLP1465 NULLP194 NULLP187 NULLP237 NULLP1401 NULLP1313 NULLP1194 NULLP1226 NULLP1425 NULLP1431 NULLP1414 NULLP1412 NULLP1446 NULLP1408 NULLP1407 NULLP1433 NULLP1432 NULLP1462 NULLP596 NULLP592 NULLP1453 NULLP1406 NULLP1429 NULLP1463 NULLP1399 NULLP1484 NULLP1418 NULLP1142 NULLP1411 NULLP1404 NULLP1474 NULLP1460</p>	<p>D Payne D Barlow P Lamb J Ratcliffe C Hall S George S Smith S Colclough S Davies Cllr D Grocott A Hardstaff A Johnson S Andrzejewski A Smith J Brennan C Findler G Walsh D Ottley T Bostock A Tizley L Millward R Smith A Flanagan M Marsh B Ottley P Smith A Pegg J Harding J Lambert J Rigby J Hardstaff G Round I McMillan L Wilkes M Mountford</p>
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			NULLP1413 NULLP1402 NULLP1403 NULLP1400 NULLP1410 NULLP1450 NULLP1486 NULLP1445 NULLP1409 NULLP1405 NULLP1420 NULLP1494 NULLP1490 NULLP1415 NULLP1419 NULLP1439 NULLP1435 NULLP1428 NULLP1443 NULLP1483 NULLP1477 NULLP1467 NULLP1492 NULLP1426 NULLP1470 NULLP1416 NULLP1440 NULLP1424 NULLP1236 NULLP1448 NULLP1452 NULLP1489 NULLP189 NULLP191 NULLP193	P Brennan R Medlock S Medlock R Owen S Edwards T Blairs D Lench F Hollingsworth P Wright A McMillan G Carr R Lewis S Paxton-Moore A Wilkes R Williams Davies N Davies J Moore P Wright D Humphries P Lambert J Hacket J Hansell G Faint D Williams D Hackett D Gill L Davies K Mayer P Bull S Moore S Faint D Paxton-Moore G Bromley J Slater D Evans
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			NULLP1456 NULLP1444 NULLP1454 NULLP1417 NULLP1449 NULLP1461 NULLP1441 NULLP1222 NULLP1476 NULLP1220 NULLP1436 NULLP1438 NULLP1458 NULLP1472 NULLP1422 NULLP1459	T Sherwood G Baddeley V Hood D Overall MS Handley M Halliday P Brennan E Bull N Bull L Foster J and C Williams P Hood D Pegg C Richmond C Quinn Mr and Mrs Zwetschnikow
Land ownership issues / uncertainty around land ownership which affects viability.	<p>The Council acknowledges the concerns raised regarding multiple land ownership interests within the allocated site CT1. Whilst the specific details of land ownership and any future agreements between landowners and developers are a private matter outside the direct remit of the Local Plan, the Council has considered the potential implications for the site's deliverability. The allocation of CT1 for residential development in the Local Plan establishes the principle of development on this site. The Council's assessment, as set out in the supporting evidence base, determined that the site is suitable for residential use and can contribute towards meeting the Borough's identified housing need. The Council recognises that assembling land under multiple ownership can be a complex process. However, the allocation of this site for residential</p>	No change required	NULLP131 NULLP142 NULLP138 NULLP182 NULLP180 NULLP184 NULLP185 NULLP137 NULLP186 NULLP1505 NULLP190 NULLP192 NULLP183 NULLP1465 NULLP194 NULLP187 NULLP1472 NULLP237	G Wilding M Thorpe L Dowling D Hall S Heinsohn P Harrison R Kent D Payne J Tidyman A Wright K Palmer D Barlow P Lamb J Ratcliffe C Hall S George C Richmond S Smith

	<p>development, in accordance with Policy CT1, is likely to incentivise landowners to work collaboratively to bring the site forward. The adopted Local Plan policies, together with the supporting evidence base and other documentation, set out a clear framework for development of the site and provide a degree of certainty for landowners and developers. The Council is confident that any issues related to land ownership will be resolved through the planning application process. Any future planning application for development on this site will need to demonstrate that the site can be delivered in a comprehensive and coordinated manner, in accordance with the requirements of Policy CT1 and other relevant Local Plan policies. The Council will work proactively with the relevant landowners and developers to facilitate the delivery of new housing on this allocated site.</p>		<p>NULLP1401 NULLP1313 NULLP1226 NULLP1425 NULLP1428 NULLP1431 NULLP1414 NULLP1412 NULLP1446 NULLP1408 NULLP1453 NULLP1406 NULLP1429 NULLP1399 NULLP1415 NULLP1410 NULLP1407 NULLP1433 NULLP1432 NULLP1484 NULLP1418 NULLP1236 NULLP1142 NULLP1460 NULLP1402 NULLP1403 NULLP1404 NULLP1400 NULLP1450 NULLP1486 NULLP1445 NULLP1449 NULLP1409 NULLP1405 NULLP1417</p>	<p>S Colclough S Davies A Hardstaff A Johnson P Wright S Andrzejewski A Smith J Brennan C Findler G Walsh M Marsh B Ottley P Smith J Harding A Wilkes S Edwards D Ottley T Bostock A Tizley J Lambert J Rigby P Bull J Hardstaff M Mountford R Medlock S Medlock I McMillan R Owen T Blairs D Lench F Hollingsworth MS Handley P Wright A McMillan D Everall</p>
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			NULLP1441 NULLP1420 NULLP1462 NULLP1220 NULLP1490 NULLP1419 NULLP1443 NULLP1467 NULLP1492 NULLP1426 NULLP1438 NULLP1416 NULLP1440 NULLP1424 NULLP1448 NULLP1452 NULLP1489 NULLP189 NULLP1222 NULLP1411 NULLP191 NULLP193 NULLP1413 NULLP1444 NULLP1454 NULLP592 NULLP1461 NULLP1476 NULLP1436 NULLP1459 NULLP596 NULLP1470 NULLP1463 NULLP1483 NULLP1477	P Brennan G Carr L Millward L Foster S Paxton-Moore R William Davies D Humphries J Hansell G Faint D Williams P Hood D Gill L Davies K Mayer S Moore S Faint D Paxton-Moore G Bromley E Bull G Round J Slater D Evans P Brennan G Baddeley V Hood A Flanagan M Halliday N Bull J and C Williams Mr and Mrs Zwetschnikow R Smith D Hackett A Pegg P Lambert
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			NULLP1494 NULLP1474 NULLP1458 NULLP1435 NULLP1422	J Hackett R Lewis L Wilkes D Pegg J Moore C Quinn
<p>Inadequate infrastructure (traffic, schools, healthcare, GP/dental access, water resources).</p> <p>Reference to St Chads school capacity issues.</p> <p>Reference to traffic on Red Street.</p> <p>Reference to GPs.</p> <p>Reference to reduced bus routes.</p> <p>No evidence of increased resource or infrastructure capacity in the supporting text.</p>	<p>The Council acknowledges the concerns raised regarding the potential impact of the proposed development on local infrastructure, including traffic, schools, healthcare, and other essential services. The Council understands the importance of ensuring that any new development is supported by adequate infrastructure and that existing services are not overburdened.</p> <p>The Infrastructure Delivery Plan (IDP), which forms part of the Local Plan evidence base, details infrastructure requirements associated with proposed site allocations, including necessary upgrades or enhancements to existing infrastructure, as well as the provision of new infrastructure where required.</p> <p>With specific reference to traffic and access, the Council acknowledges the concerns raised about increased traffic volumes on Red Street and the surrounding road network. A Transport Assessment will be required as part of any future planning application, which should consider the impact of the proposed development on the local road network and identify appropriate mitigation measures. This assessment will be scrutinised and reviewed in detail to ensure that the proposed development does not result in unacceptable traffic impacts.</p> <p>Regarding school capacity, the Council is aware of the existing pressures on school places in the area.</p>	No change required	NULLP131 NULLP142 NULLP138 NULLP180 NULLP1494 NULLP185 NULLP137 NULLP186 NULLP1505 NULLP190 NULLP192 NULLP183 NULLP194 NULLP187 NULLP182 NULLP237 NULLP184 NULLP191 NULLP193 NULLP175 NULLP1425 NULLP1413 NULLP1415 NULLP1420 NULLP307 NULLP1462 NULLP596 NULLP592 NULLP1313	G Wilding M Thorpe L Dowling S Heinsohn R Lewis R Kent D Payne J Tidyman A Wright K Palmer D Barlow P Lamb C Hall S George D Hall S Smith P Harrison J Slater D Evans BA Birks A Johnson P Brennan A Wilkes G Carr J Austin L Millward R Smith A Flanagan S Davies

	<p>The infrastructure delivery plan has considered this issue with Staffordshire County Council, as the Local Education Authority, to ensure that there is sufficient school capacity to accommodate the needs of the growing population. Further details relating to the provision of additional school places are set out in the IDP. The Council will also continue to monitor the situation and will work with Staffordshire County Council and relevant stakeholders to secure any necessary improvements to school facilities.</p> <p>In relation to healthcare provision, the Council acknowledges the concerns raised about access to GPs and dental services. The IDP identifies the need for financial contributions towards additional healthcare provision to support new development, and the Council is working closely with the Integrated Care Board (ICB) to address these needs. The Council will seek to secure contributions from developers towards improvements in healthcare provision, including new or expanded facilities, through planning obligations where appropriate. In addition, the Council will continue to monitor the capacity of existing healthcare facilities and work with providers to ensure that residents have access to the services they need.</p> <p>The Council also notes the concerns raised regarding water resources and confirms that these issues have been considered as part of the allocation process and will be further scrutinised at planning application stage. The Water Cycle Study (WCS), which forms part of the evidence base, assesses the capacity of existing water infrastructure, and identifies any necessary</p>		<p>NULLP1409 NULLP1453 NULLP1401 NULLP1407 NULLP1236 NULLP1406 NULLP1429 NULLP1461 NULLP1445 NULLP1411 NULLP1463 NULLP1399 NULLP1484 NULLP1431 NULLP1477 NULLP1458 NULLP1418 NULLP1454 NULLP1483 NULLP1220 NULLP1142 NULLP1476 NULLP1404 NULLP1444 NULLP1483 NULLP1460 NULLP1405 NULLP1441 NULLP1417 NULLP1402 NULLP1403 NULLP1433 NULLP1449 NULLP1465 NULLP1400</p>	<p>P Wright M Marsh S Colclough D Ottley P Bull B Ottley P Smith M Halliday F Hollingsworth G Round A Pegg J Harding J Lambert S Andrzejewski J Hackett D Pegg J Rigby V Hood P Lambert L Foster J Hardstaff N Bull I McMillan G Baddeley P Lambert M Mountford A McMillan P Brennan D Overall R Medlock S Medlock T Bostock MS Handley J Ratcliffe R Owen</p>
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	<p>upgrades or enhancements to support new development. The Council will continue to work closely with water companies to ensure that new developments are served by adequate water infrastructure.</p> <p>The Council is confident that, through careful planning and collaboration with relevant stakeholders, the necessary infrastructure improvements can be delivered to support the proposed development at CT1, ensuring that it is sustainable and integrated into the existing community.</p>		NULLP1432 NULLP1226 NULLP1472 NULLP1410 NULLP1446 NULLP1450 NULLP1486 NULLP1490 NULLP1419 NULLP1439 NULLP1459 NULLP1435 NULLP1428 NULLP1438 NULLP1443 NULLP1467 NULLP1492 NULLP1414 NULLP1426 NULLP1143 NULLP1194 NULLP1470 NULLP1474 NULLP1408 NULLP1416 NULLP1436 NULLP1440 NULLP1456 NULLP1424 NULLP1222 NULLP1448 NULLP1452 NULLP1412 NULLP1489 NULLP182	A Tizley A Hardstaff C Richmond S Edwards C Findler T Blairs D Lench S Paxton-Moore R William Davies N Davies Mr and Mrs Zwetschnikow J Moore P Wright P Hood D Humphries J Hansell G Faint A Smith D Williams J Hardstaff Cllr D Grocott D Hackett L Wilkes G Walsh D Gill J and C Williams L Davies T Sherwood K Mayer E Bull S Moore S Faint J Brennan D Paxton-Moore
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			NULLP189 NULLP1313 NULLP1494 NULLP1422	D Hall G Bromley S Davies R Lewis C Quinn
Loss of Biodiversity/ Wildlife.	<p>The Council acknowledges the concerns raised regarding the potential impact of the proposed development on biodiversity and wildlife at the CT1 site. The Council recognises the importance of protecting and enhancing biodiversity, as reflected in Policy SE7: Biodiversity Net Gain and Policy SE8: Biodiversity and Geodiversity, and the requirement for development proposals to deliver a measurable net gain in biodiversity.</p> <p>Any future planning application should be accompanied by an ecological assessment. This assessment will need to be carried out in accordance with best practice guidance and will be used to identify any potential impacts on protected species and habitats, and to inform appropriate mitigation and compensation measures. The ecological assessment will need to demonstrate that any proposed development will not result in any significant adverse impacts on European or UK protected species, or on the integrity of designated sites for nature conservation, including Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites.</p> <p>As part of the site allocation process, consideration has also been given to the potential impacts of development on the wider ecological network and green infrastructure corridors, and any future planning application will need to demonstrate how the proposed development will contribute to the enhancement of these assets in accordance with</p>	No change required	NULLP131 NULLP142 NULLP138 NULLP182 NULLP184 NULLP185 NULLP137 NULLP186 NULLP1505 NULLP190 NULLP191 NULLP192 NULLP183 NULLP193 NULLP1465 NULLP194 NULLP187 NULLP237 NULLP1401 NULLP1313 NULLP1425 NULLP1431 NULLP1456 NULLP1414 NULLP1412 NULLP1413 NULLP1415 NULLP1410 NULLP1444 NULLP1446	G Wilding M Thorpe L Dowling D Hall P Harrison R Kent D Payne J Tidyman A Wright K Palmer J Slater D Barlow P Lamb D Evans J Ratcliffe C Hall S George S Smith S Colclough S Davies A Johnson S Andrzejewski T Sherwood A Smith J Brennan P Brennan A Wilkes S Edwards G Baddeley C Findler

	<p>Policy SE14: Green and Blue Infrastructure and supporting text.</p> <p>The Council is committed to ensuring that all new development in the Borough contributes to a net gain in biodiversity, in line with the requirements of Policy SE7. The achievement of BNG will be a key consideration in the determination of planning applications, and developers will be expected to demonstrate how they have followed the biodiversity gain hierarchy.</p> <p>In the case of CT1, the Council acknowledges that future development will likely result in the loss of some existing habitats, including agricultural land and hedgerows. The Council considers, however, that the proposed development provides an opportunity to deliver significant ecological enhancements, both on and off-site, which will contribute towards achieving a net gain in biodiversity. These enhancements could include the creation of new habitats, such as species-rich grassland or native woodland planting, as well as the enhancement of existing habitats, such as hedgerows and watercourses.</p> <p>The Council will work with developers and relevant stakeholders, including Natural England, and the Staffordshire Wildlife Trust, to ensure that the proposed development at CT1 delivers a net gain in biodiversity and contributes to the wider ecological network and green infrastructure objectives of the Local Plan. The Council will also seek to secure appropriate monitoring and management of the biodiversity enhancements, to ensure their long-term effectiveness.</p>		<p>NULLP1408</p> <p>NULLP1445</p> <p>NULLP1411</p> <p>NULLP1453</p> <p>NULLP1406</p> <p>NULLP1429</p> <p>NULLP1399</p> <p>NULLP1409</p> <p>NULLP1405</p> <p>NULLP1407</p> <p>NULLP1441</p> <p>NULLP1436</p> <p>NULLP1420</p> <p>NULLP592</p> <p>NULLP1484</p> <p>NULLP1418</p> <p>NULLP1142</p> <p>NULLP1460</p> <p>NULLP1402</p> <p>NULLP1403</p> <p>NULLP1404</p> <p>NULLP1400</p> <p>NULLP1450</p> <p>NULLP1486</p> <p>NULLP1449</p> <p>NULLP1417</p> <p>NULLP1461</p> <p>NULLP1433</p> <p>NULLP1462</p> <p>NULLP1220</p> <p>NULLP1470</p> <p>NULLP1463</p> <p>NULLP1490</p> <p>NULLP1419</p> <p>NULLP1477</p>	<p>G Walsh</p> <p>F Hollingsworth</p> <p>G Round</p> <p>M Marsh</p> <p>B Ottley</p> <p>P Smith</p> <p>J Harding</p> <p>P Wright</p> <p>A McMillan</p> <p>D Ottley</p> <p>P Brennan</p> <p>J and C Williams</p> <p>G Carr</p> <p>A Flanagan</p> <p>J Lambert</p> <p>J Rigby</p> <p>J Hardstaff</p> <p>M Mountford</p> <p>R Medlock</p> <p>S Medlock</p> <p>I McMillan</p> <p>R Owen</p> <p>T Blairs</p> <p>D Lench</p> <p>MS Handley</p> <p>D Everall</p> <p>M Halliday</p> <p>T Bostock</p> <p>L Millward</p> <p>L Foster</p> <p>D Hackett</p> <p>A Pegg</p> <p>S Paxton-Moore</p> <p>R William Davies</p> <p>J Hackett</p>
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Questions CT1's inclusion given TK17's presence and CT4's removal.	The Council acknowledges the concerns raised regarding the selection of CT1 alongside TK17 and the removal of CT4 from the plan. The Council	No change required	NULLP131 NULLP142 NULLP138	G Wilding M Thorpe L Dowling

	<p>wishes to reiterate that all site allocations, including CT1, have been subject to a thorough and robust site selection process, as set out in the Site Selection Methodology Paper within the Local Plan evidence base. This process considered a wide range of factors, including Green Belt assessments, sustainability appraisals, infrastructure requirements, and deliverability.</p> <p>The Council acknowledges that the Green Belt Site Review referred to the relationship between CT1 and TK17 and to the potential impact on the openness of the Green Belt to the south of the site. However, it is important to note that the Green Belt Site Review is just one of several evidence base documents that informed the site selection process. The Council also considered other factors, including the need to meet the Borough's housing requirements, as set out in Policy PSD1 (Overall Development Strategy) and Policy PSD3 (Distribution of Development), and the need to ensure that development is directed to the most sustainable locations in accordance with the settlement hierarchy.</p> <p>The Council's assessment concluded that the exceptional circumstances required to justify the release of these sites from the Green Belt had been demonstrated, and that both sites were suitable for allocation. The sites are not considered to unacceptably impact upon openness, either individually or cumulatively, and will not result in unrestricted sprawl or the merging of settlements. The removal of CT4 was based on further detailed assessment, which concluded that the site was not suitable for allocation at this time. The Council is satisfied that the inclusion of CT1, even in the</p>		<p>NULLP182 NULLP184 NULLP185 NULLP137 NULLP186 NULLP1505 NULLP190 NULLP191 NULLP192 NULLP183 NULLP193 NULLP1465 NULLP194 NULLP187 NULLP237 NULLP1401 NULLP1425 NULLP1428 NULLP1431 NULLP1439 NULLP1456 NULLP1414 NULLP1412 NULLP1413 NULLP1415 NULLP1410 NULLP1444 NULLP1446 NULLP1408 NULLP1445 NULLP1411 NULLP1453 NULLP1406 NULLP1429 NULLP1399</p>	<p>D Hall P Harrison R Kent D Payne J Tidyman A Wright K Palmer J Slater D Barlow P Lamb D Evans J Ratcliffe C Hall S George S Smith S Colclough A Johnson P Wright S Andrzejewski N Davies T Sherwood A Smith J Brennan P Brennan A Wilkes S Edwards G Baddeley C Findler G Walsh F Hollingsworth G Round M Marsh B Ottley P Smith J Harding</p>
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	<p>absence of CT4, remains justified and contributes to a sustainable pattern of development. The Council considered the potential cumulative impacts of development on the surrounding area, including the relationship between CT1 and TK17, and concluded that the proposed allocations are appropriate and will not result in unacceptable harm to the character of the surrounding area. The Council recognises that there are differing views on the allocation of CT1 and has carefully considered all representations made on this matter. However, the Council is confident that the site selection process has been robust, transparent, and in accordance with national policy and guidance, and that the allocation of CT1 is justified and sound.</p>		NULLP1449 NULLP1417 NULLP1461 NULLP1436 NULLP1477 NULLP1432 NULLP1474 NULLP1484 NULLP1418 NULLP1483 NULLP1142 NULLP1460 NULLP1402 NULLP1403 NULLP1404 NULLP1400 NULLP1313 NULLP1450 NULLP1486 NULLP1409 NULLP1405 NULLP1407 NULLP1433 NULLP1420 NULLP1462 NULLP1222 NULLP1236 NULLP1476 NULLP1470 NULLP1472 NULLP1490 NULLP1419 NULLP1443 NULLP1467 NULLP1492	MS Handley D Everall M Halliday J and C Williams J Hackett A Tizley L Wilkes J Lambert J Rigby P Lambert J Hardstaff M Mountford R Medlock S Medlock I McMillan R Owen S Davies T Blairs D Lench P Wright A McMillan D Ottley T Bostock G Carr L Millward E Bull P Bull N Bull D Hackett C Richmond S Paxton-Moore R William Davies D Humphries J Hansell G Faint
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CT1 has remained relatively unchanged since the 1830's and is a striking feature of the area.	The Council acknowledges the observation regarding the historical land use of CT1. However, the absence of significant change over a long period does not, in itself, preclude the site from being considered for development. The Council has a statutory duty to plan for the future housing needs of the Borough, and this requires a balanced assessment of all potential sites, including those which may have remained undeveloped for a considerable period of time. The potential impacts of development on any identified heritage asset	No change required	NULLP180	S Heinsohn

	<p>within close proximity to the site, and any impacts on the character and appearance of the surrounding area will need to be carefully considered at the planning application stage. The Council has a duty to ensure that any development is sympathetic to the historic environment and does not cause unacceptable harm to heritage assets or their settings, in accordance with Policy SE9 Historic Environment.</p> <p>Whilst the site may not have undergone significant development in recent times, this does not necessarily mean that it is unsuitable for development, nor that it is of high intrinsic heritage or environmental value. The Council's assessment of the site has considered a range of factors, including its location, accessibility, and potential to contribute to meeting the Borough's housing needs. The Council has also considered the potential impacts of development on the character and appearance of the surrounding area.</p> <p>The Council is committed to ensuring that any development of CT1 is of high quality and is designed in a sensitive manner that respects the character and appearance of the surrounding area. To this end, the Council will require any future development proposals to comply with the design requirements set out in Policy PSD7 Design, as well as all other relevant policies in the Local Plan.</p>			
Disruption caused during construction.	<p>The Council acknowledges the concerns raised regarding potential disruption during the construction phase of any development on CT1. While some level of disruption is unavoidable with any major construction project, the Council is committed to ensuring that this is kept to a</p>	No change required	NULLP175 NULLP1143	BA Birks J Hardstaff

	<p>minimum and that appropriate mitigation measures are put in place.</p> <p>All major development proposals for this site will be required to include a detailed Construction Management Plan (CMP) as part of any planning application, in accordance with Policy SE1 Pollution and Air Quality and supporting text. This plan will need to set out how the developer intends to minimise disruption to the local community and environment during the construction phase. This will include but not be limited to, measures to control noise, dust, vibration, and traffic impacts, as well as details of proposed working hours, site access arrangements, and the routing of construction vehicles. The CMP will also need to address any potential impacts on air quality, water quality, and biodiversity, and set out appropriate mitigation measures to address these impacts in accordance with Policies SE1, SE4, SE5 and SE7 of the Local Plan. The Council will carefully consider the content of the submitted CMP and will expect this to fully address all concerns raised in relation to potential construction impacts.</p> <p>The CMP will be subject to approval by the Council, and its implementation will be monitored throughout the construction phase. This will ensure that any disruption is kept to a minimum and that the development is carried out in a responsible and considerate manner. The Council will also work with developers and relevant stakeholders to ensure that the local community is kept informed of any potential disruptions and that any concerns are addressed promptly and effectively.</p>			
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<p>Available brownfield should be chosen over Green Belt.</p>	<p>The Council acknowledges the concerns raised regarding the use of greenfield sites for development. The Council has adopted a brownfield-first approach to site selection, prioritising the development of previously developed land within the urban area in the first instance, in line with the requirements of the NPPF. The council has concluded, however, that there is insufficient capacity on suitable brownfield sites to accommodate the entirety of the Borough's identified housing need over the plan period.</p> <p>The Council has undertaken a comprehensive site selection process, as outlined in the Site Selection Methodology Paper, which considered a wide range of factors, including the availability of suitable brownfield sites, environmental constraints, and the need to deliver sustainable development. This process has determined that the development of some greenfield sites, including some sites within the Green Belt, is necessary to meet the identified housing requirement for the plan period, as set out in Policy PSD1: Overall Development Strategy.</p> <p>The decision to allocate greenfield sites for development was not taken lightly and was only made after careful consideration of all other options. The Council is committed to ensuring that any development on greenfield land is undertaken in a sensitive and sustainable manner, with appropriate mitigation measures put in place to minimise any potential impacts on the environment, including biodiversity, landscape character, and the setting of heritage assets. The Council will continue to prioritise the development</p>	<p>No change required</p>	<p>NULLP192 NULLP1313 NULLP1143 NULLP1428</p>	<p>D Barlow S Davies J Hardstaff P Wright</p>
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	of suitable brownfield sites wherever possible and will work with developers to ensure that any new development on greenfield sites delivers a net gain in biodiversity, in accordance with Policy SE7: Biodiversity Net Gain.			
Starlings and Lapwings are present on CT1 and are protected by Wildlife and Countryside Act 1981.	<p>The Council acknowledges the concerns raised regarding the potential presence of protected species, including starlings and lapwings, on or in proximity to CT1. The Council is committed to protecting and enhancing biodiversity within the Borough, as set out in Policy SE8: Biodiversity and Geodiversity.</p> <p>The Council confirms that any future planning application for development of CT1 will be required to undertake appropriate ecological assessments, in accordance with relevant legislation and best practice guidance. This will include, where necessary, protected species surveys to identify the presence of any protected species, including those listed under the Wildlife and Countryside Act 1981, and to assess the potential impacts of development on these species and their habitats.</p> <p>Should any protected species be identified on or near the site, the planning application will need to demonstrate how the proposed development will avoid or mitigate any potential negative impacts, in accordance with the mitigation hierarchy set out in the NPPF and Policy SE8. This may include measures such as timing restrictions on works, habitat creation or enhancement, or the provision of buffer zones between the development and sensitive ecological features.</p> <p>The Council will work closely with developers, ecologists, and relevant statutory bodies, such as</p>	No change required	NULLP1143	J Hardstaff

	<p>Natural England, to ensure that any development of CT1 is carried out in a manner that is sensitive to the ecological value of the area and that it complies with all relevant legislation and policy requirements, including those relating to protected species. The Council is confident that, through the implementation of appropriate mitigation measures, any potential impacts on protected species can be addressed, and that the development can be delivered in a sustainable and responsible manner. The Council will also consider the findings of any ecological assessments, and any proposed mitigation measures, when determining any planning application for the site and may impose planning conditions or seek planning obligations to secure their implementation.</p>			
<p>The land has value in lowering the carbon footprint as it currently supports farming for local produce.</p>	<p>The Council acknowledges the concerns raised regarding the potential impact of development on CT1's current agricultural use and its contribution to local food production. The Council recognises the importance of sustainable food systems and the role that local agriculture can play in reducing carbon emissions associated with food miles and supporting the local economy.</p> <p>However, the Council also needs to balance the need for new housing and employment land with the protection of agricultural land. The Local Plan, informed by detailed evidence and strategic assessments, has identified CT1 as a suitable and sustainable location for development to meet identified needs within the Borough, as set out in Policy PSD1: Overall Development Strategy. The Council is satisfied that the exceptional circumstances required to justify the release of this site from the Green Belt have been met.</p>	<p>No change required</p>	<p>NULLP1143</p>	<p>J Hardstaff</p>

	<p>The Council is committed to promoting sustainable development and reducing carbon emissions across the Borough, as outlined in Policy CRE1: Climate Change and Policy CRE2: Renewable Energy. These policies encourage all new development to follow the energy and heat hierarchy and to incorporate sustainable practices, energy-efficient measures, and low-carbon construction methods. Furthermore, any development proposals for CT1 will be required to demonstrate how they will minimise their carbon footprint, both during construction and operation, and how they will contribute to the Council's wider sustainability objectives. This may include measures such as incorporating renewable energy generation on site, using sustainable drainage systems to manage surface water runoff, providing for active travel such as walking and cycling, and using green infrastructure to enhance carbon capture and support the wider green/blue infrastructure network. In addition, development proposals will also need to consider the need for on-site food production and opportunities to support local food supply chains, through the provision of allotments or other suitable mechanisms, in accordance with Policy CRE1: Climate Change.</p> <p>The Council believes that development at CT1 can be delivered in a sustainable manner, incorporating measures to minimise its environmental impact, and contributing to the Borough's overall sustainability goals. The detailed design and layout of the development will be subject to further scrutiny at the planning application stage, and the Council will work with</p>			
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	the developer to ensure that these matters are appropriately addressed.			
Type of house being built do not suit average wages in Newcastle under Lyme (Newcastle is a low-income area). No affordable houses.	<p>The Council acknowledges the concerns raised regarding the affordability and suitability of housing proposed for CT1. The Council is committed to ensuring that new development within the Borough meets the diverse housing needs of all residents, including those on lower incomes.</p> <p>The specific mix of housing types, tenures, and sizes for CT1 will be determined at the planning application stage, considering a range of factors including the findings of the Housing and Economic Development Needs Assessment (HEDNA), which provides a detailed assessment of local housing need across the borough. This evidence base identifies the need for a range of housing types and tenures, including affordable housing, to meet the needs of different households in the area.</p> <p>The Local Plan includes specific policies to ensure the delivery of affordable housing as part of new developments. Policy HOU1: Affordable Housing sets out the requirements for affordable housing provision on sites of 10 dwellings or more, or sites of 0.5ha or more, and requires a specified proportion of new homes to be affordable, in line with the identified needs of the borough. The specific percentage of affordable housing required on CT1 will be determined based on the viability assessment for the site and the prevailing policy requirements at the time of any planning application.</p> <p>Furthermore, Policy HOU2: Housing Mix and Density requires all new developments to provide a mix of housing types, sizes, and tenures to meet</p>	No change required	NULLP1420	G Carr

	<p>local needs and create mixed and balanced communities. This will include consideration of the need for smaller and more affordable homes, suitable for first-time buyers, young families, and older people seeking to downsize.</p> <p>The Council is confident that the detailed planning application process, informed by the HEDNA and other relevant evidence, will ensure that any future development at CT1 provides a mix of housing that is appropriate to the local context and meets the identified housing needs of the Borough, including the need for affordable housing. The Council will work with developers to ensure that all new housing development is of high quality, well-designed, and accessible to a range of households.</p>			
Potential traffic from developments in Chatterley Valley and other industrial areas.	<p>The Council acknowledges the concerns raised regarding the potential impact of traffic from developments in Chatterley Valley and other industrial areas on CT1 and the surrounding road network. The Council is aware of the potential for cumulative traffic impacts arising from multiple developments in the area and will consider these impacts carefully in its assessment of any planning application for CT1.</p> <p>The Council confirms that any planning application for development on CT1 will be required to undertake a detailed Transport Assessment in accordance with Policy IN2 Transport and Accessibility. This assessment will need to consider the traffic impact of the proposed development both individually and cumulatively, including any development in Chatterley Valley. The Transport Assessment will need to identify any necessary mitigation measures to address any adverse</p>	No change required	NULLP307	J Austin

	<p>impacts on the local road network, including any potential impacts on the A34, nearby junctions, and access points. The assessment will need to consider the impact of all potential traffic to and from the site, including vehicles associated with the construction and operation of the development, as well as any vehicles associated with existing or future employment uses on the site. The Council will work with the applicant, the local highway authority, and other relevant stakeholders to ensure that any identified impacts are appropriately mitigated and that the proposed development does not result in unacceptable impacts on the safety, efficiency, or capacity of the local road network.</p>			
Red Street will become a busy town.	<p>The Council acknowledges the concerns raised regarding the potential impact of development on the character and scale of Red Street. The Council understands that residents value the existing character of the area and are concerned about the potential for overdevelopment.</p> <p>However, it is important to note that the proposed allocation of CT1 for residential development forms part of a wider strategy for accommodating necessary growth within the Borough. The overall scale and distribution of development, including the housing requirements for Crackley and Red Street, have been carefully considered through a robust, evidence-based process and are in line with the Council's Settlement Hierarchy, as set out in Policy PSD2: Settlement Hierarchy and supporting text. The Settlement Hierarchy identifies Red Street as part of the Strategic Centre of Newcastle-under-Lyme, which is the primary focus for new</p>	No change required	NULLP1222	E Bull

	<p>housing, employment, and other key services and facilities within the Borough.</p> <p>The Council recognises that Red Street is a distinct community with its own character and identity, and that any new development must be sensitive to this context. The proposed allocation at CT1 has been carefully assessed to ensure that it is proportionate to the size and character of the area and that it can be integrated effectively with the existing built environment. Furthermore, the development will be subject to high-quality design requirements, as set out in Policy PSD7: Design, which will ensure that it respects the local context and contributes positively to the character of the area. This policy, along with other policies within the Local Plan, including those on landscaping, open space, and green infrastructure (Policy SE6), trees, hedgerows and woodland (Policy SE11), and the protection of heritage assets and their setting (Policy SE9), will be used to guide the detailed design and layout of any new development on the site and to ensure that it integrates successfully with its surroundings.</p> <p>The Council also acknowledges the concerns raised regarding the capacity of existing infrastructure and services to accommodate new development. The Infrastructure Delivery Plan (IDP), which forms part of the Local Plan evidence base, identifies the infrastructure requirements associated with the proposed development, including any necessary upgrades or enhancements to existing infrastructure. The Council will work closely with developers, infrastructure providers, and other stakeholders to ensure that the necessary infrastructure is delivered in a timely manner to</p>			
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	<p>support the new development. This will include securing financial contributions from developers towards infrastructure improvements, where appropriate.</p> <p>The Council is confident that, through careful planning and design, and with the implementation of appropriate mitigation measures and infrastructure improvements, any proposed development at CT1 can be successfully integrated into the existing community and can contribute to the sustainable growth and regeneration of the area.</p>			
Requests a site-wide utilities masterplan and associated explanatory text for CT1 due to its peripheral location relating to their and Severn Trent's operational areas.	The Council acknowledges United Utilities' representation regarding CT1 and notes the request for a site-wide utilities masterplan and associated explanatory text. The Council understands the concerns raised due to the site's peripheral location in relation to UU and Severn Trent's operational areas. We confirm that the need for a utilities masterplan will be assessed as part of the planning application process for the site and that developers are expected to consult proactively with all relevant utility providers, including UU and Severn Trent, to ensure that sufficient capacity exists to support the proposed development. Additional text is proposed to be added to the site criteria for the site.	Additional criteria 12, to refer to the need for a utilities masterplan for the site.	NULLP1042	United Utilities
Additional 450 houses being built could make flooding on the A34 worse.	The Council acknowledges the concerns raised regarding the potential impact of the proposed development on flooding, particularly in relation to the A34. The Council is committed to ensuring that new development does not increase flood risk and, where possible, contributes to reducing flood risk overall.	No change required	NULLP1401 NULLP1220	S Colclough L Foster

	<p>The Council confirms that any development proposal for CT1 will be required to comply with the requirements of Policy SE3: Flood Risk Management and Policy SE4: Sustainable Drainage Systems. These policies require a sequential approach to development, directing development to areas at the lowest risk of flooding first. Where development in areas at risk of flooding is unavoidable, the policy requires a site-specific Flood Risk Assessment (FRA) to be undertaken to demonstrate that the development will not increase flood risk elsewhere and will be safe for its lifetime, considering the impacts of climate change.</p> <p>Specifically, in relation to surface water flooding, Policy SE4 requires developments to incorporate Sustainable Drainage Systems (SuDS) to manage surface water runoff and prevent any increase in flood risk to downstream areas. The SuDS strategy for the site will need to be developed in consultation with the Lead Local Flood Authority (Staffordshire County Council) and will need to demonstrate that surface water runoff rates and volumes will not exceed pre-development levels. Any proposed development will also be required to consider the contents of the Strategic Flood Risk Assessment (SFRA) and incorporate appropriate mitigation measures to address any identified risks. The detailed design and layout of the development, including the provision of adequate drainage infrastructure, will be subject to further scrutiny at the planning application stage. The Council is confident that, through the implementation of appropriate flood risk management and sustainable drainage measures,</p>			
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	any potential flood risk associated with the development of CT1 can be adequately mitigated and that the development will not exacerbate existing flooding issues in the area or on the A34.			
The wellbeing of people is important and the mental health at risk.	<p>The Council acknowledges the concerns raised regarding the potential impact of development on the wellbeing of residents, including their mental health. The Council recognises the importance of creating healthy and sustainable communities that promote wellbeing and enhance the quality of life for all residents.</p> <p>The Local Plan includes a number of policies aimed at achieving these objectives, including Policy PSD6: Health and Wellbeing, which specifically seeks to support development that fosters safe, healthy, and active lifestyles. This policy promotes the provision of accessible green spaces, opportunities for active travel (walking and cycling), and the creation of inclusive communities that support social interaction and reduce isolation.</p> <p>Furthermore, Policy SE6: Open Space, Sports and Leisure Provision requires new development to provide adequate open space and recreational facilities, which can contribute significantly to physical and mental wellbeing. The Council will work with developers to ensure that new development provides high-quality, accessible open spaces that meet the needs of the community.</p> <p>In addition, Policy SE14: Green and Blue Infrastructure promotes the creation of a well-connected network of green and blue spaces throughout the Borough, providing opportunities for recreation, relaxation, and contact with nature,</p>	No change required	NULLP1462	L Millward

	<p>all of which are known to have positive impacts on mental health.</p> <p>The Council also acknowledges the concerns raised regarding the potential disruption caused by construction works. As outlined in the response to earlier comments, any planning application for development on this site will be required to submit a Construction Management Plan (CMP) that sets out measures to minimise disruption to the local community during the construction phase. This will include consideration of noise, dust, traffic, and other potential impacts.</p> <p>The Council is confident that, through the implementation of these policies and the careful consideration of design and layout, any proposed development at CT1 can be delivered in a way that minimises any negative impacts on the wellbeing of existing residents and creates a high-quality living environment for future residents.</p>			
St Chads has no space for expansion.	<p>The Council acknowledges the concerns raised regarding the capacity of local schools, including St Chad's Primary School, to accommodate additional pupils arising from the proposed allocation. The Council is committed to ensuring that there are sufficient school places to meet the needs of both existing and future residents.</p> <p>The Infrastructure Delivery Plan (IDP), which forms part of the Local Plan evidence base, identifies the potential need for additional school places to support new development across the Borough. The IDP outlines the planned delivery of infrastructure, including educational facilities, to support the planned growth, set out in the Local Plan. It specifically identifies that further expansion may</p>	No change required	NULLP1494	R Lewis

	<p>be necessary at both the primary and secondary school level to accommodate the increase in pupil numbers resulting from proposed site allocations. The IDP sets out that there are a number of primary schools, including St. Chad's, that serve the local area. The IDP identifies that there is a need to provide additional school places in the area and sets out that such provision will need to be in the form of either expansion of existing schools and/or the provision of new schools. The Council will work with developers and Staffordshire County Council as the Local Education Authority to ensure that any necessary improvements or expansion of existing schools, including St Chad's Primary School, or the provision of new schools are delivered in a timely manner, in accordance with Policy IN1: Infrastructure and Policy IN5: Provision of Community Facilities. The specific requirements for education provision, including the location and timing of any new or expanded facilities, will be determined at the planning application stage, considering the latest pupil forecasts, the phasing of development, and the availability of funding. The Council will seek to secure financial contributions from developers towards the provision of additional school places, where appropriate, through planning obligations or other relevant mechanisms.</p> <p>The Council is confident that, through careful planning and collaboration with relevant stakeholders, including Staffordshire County Council and local schools, sufficient school places can be provided to meet the needs of both existing and future residents.</p>			
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<p>CT1's size and scale is inappropriate for this semi-rural area.</p>	<p>The Council acknowledges the concerns raised regarding the scale of the proposed development at CT1 and its potential impact on the character of the surrounding area. However, the Council considers that the size and scale of the allocation are appropriate and justified in the context of the identified housing need within the Borough and the strategic objectives of the Local Plan. The allocation of CT1 for residential development has been informed by a thorough assessment of the site's suitability and capacity, considering a range of factors including its location within the settlement hierarchy, its accessibility to services and facilities, and its relationship to the existing built form. The Council's assessment has also considered the potential impact of the development on the character and appearance of the surrounding area, including the semi-rural setting of the site.</p> <p>The proposed allocation of CT1 is consistent with the overall development strategy for the Borough, as set out in Policy PSD1: Overall Development Strategy, which seeks to direct new housing growth to sustainable locations that are well-connected to existing services and infrastructure. The allocation of CT1 is also in line with the settlement hierarchy outlined in Policy PSD2: Settlement Hierarchy, which identifies the site as being with the Strategic Centre of Newcastle-under-Lyme where significant levels of growth are to be provided and is also consistent with Policy PSD3: Distribution of Development, which sets out an indicative housing target for the area within which CT1 is situated.</p>	<p>No change required</p>	<p>NULLP1463 NULLP1458</p>	<p>A Pegg D Pegg</p>
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	<p>The Council recognises that the development of CT1 may result in a change to the character of the area, however, the Council considers that this change is justified considering the identified need for new housing in the Borough and the limited availability of suitable alternative sites.</p> <p>Furthermore, the Council is confident that the proposed development can be designed and delivered in a manner that is sensitive to the local context and that minimises any adverse impacts on the character and appearance of the surrounding area. Policy PSD7: Design requires development proposals to have a high-quality design which reflects the local character.</p> <p>The specific design and layout of the development, including the height, massing, and density of buildings, will be subject to further detailed assessment at the planning application stage. The Council will expect any future development proposals to demonstrate how they have responded to the site's context and setting, and how they will integrate with the existing built form. Proposals will also be expected to incorporate appropriate landscaping and green infrastructure measures to help mitigate the visual impact of the development and to enhance the biodiversity and amenity value of the site.</p> <p>The Council is committed to ensuring that all new development in the Borough is of a high quality and makes a positive contribution to the character and appearance of the area. The Council believes that the proposed allocation of CT1 for development is appropriate and justified, and that any potential impacts can be adequately mitigated</p>			
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	through the detailed design and planning application process.			
Supports the CT1 allocation and confirms their readiness to bring the site forward for development. Questions the necessity for all three access points originally proposed by SCP given the site's reduced size and suggests amending point 2 accordingly. Notes considerable market interest in the site.	The Council acknowledges Mr. Fradley's representation regarding the CT1 allocation and thanks him for his support and intention to bring the site forward for development. Regarding the access points, the Council confirms that the number and configuration of access points will be determined during the detailed design stage of the development, considering the final layout and proposed number of dwellings. The Council notes the market interest expressed in the site.	No change required	NULLP772	BJ Fradley
Suggests amending policy wording 4a to include a reference to public transport connectivity and sets out suggested wording for this amendment. Notes SCC intention to address this issue at hearing sessions if required.	The Council acknowledges Staffordshire County Council's (SCC) comment regarding CT1 and criterion 4a. The Council maintains that the current wording, read in conjunction with Policy IN2 (Transport and Accessibility), adequately addresses the need for the development to consider connectivity by public transport. Policy IN2 sets out the requirement for new developments to provide access by sustainable modes of transport, working with developers to ensure an accessible, efficient, and safe transport network. The supporting text for Policy IN2 provides further details on sustainable and active travel considerations, including access for pedestrians, cyclists, and public transport users. However, for clarification, criterion 4a is proposed to be amended.	To amend criterion 4a to refer more directly to public transport provision	NULLP1086	Staffordshire County Council
What about resources such as water, where will the additional water come from?	The Council acknowledges the concerns raised regarding the provision of adequate water resources for the proposed development at CT1. The Council recognises the importance of ensuring that new development has a secure and	No change required	NULLP1460	M Mountford

	<p>sustainable supply of water and does not place undue pressure on existing resources.</p> <p>The Council has undertaken a Water Cycle Study (WCS) as part of the evidence base for the Local Plan, which assesses the capacity of existing water infrastructure, including both water supply and wastewater treatment. The WCS identifies potential constraints and considers the implications of future development for water resources in the Borough. The findings of the WCS have informed the development of Policy SE5: Water Resources and Water Quality, which requires all new development to demonstrate a commitment to sustainable water management and to mitigate any adverse impacts on water quality.</p> <p>While the WCS provides a strategic overview of water resource issues, the Council recognises that detailed assessments will be required at the planning application stage to confirm the availability of water supplies and the capacity of the existing infrastructure to serve the proposed development. In line with Policy SE5, developers will be required to work with the relevant water companies (Severn Trent Water and United Utilities) to identify any necessary infrastructure upgrades or enhancements and to incorporate appropriate water efficiency and reuse measures into their proposals.</p> <p>The Council is committed to ensuring that all new development in the Borough is supported by adequate infrastructure, including a secure and sustainable water supply. The Council will continue to work with the water companies and other stakeholders to monitor the capacity of existing</p>			
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	<p>infrastructure and to plan for future needs, considering the potential impacts of climate change on water resources. The detailed design and layout of the development at CT1 will need to incorporate appropriate measures to manage water demand and ensure the efficient use of water resources, in accordance with best practice and the specific requirements set out in the Local Plan.</p>			
Damage to the environment.	<p>The Council acknowledges the concerns raised regarding the potential environmental impacts of the proposed development at CT1. The Council is committed to sustainable development and the protection and enhancement of the environment, as outlined in Section 11 (Sustainable Environment) of the Local Plan. This includes a suite of policies aimed at minimising the environmental impact of new development and promoting sustainable practices.</p> <p>All development proposals within the Borough are required to comply with the relevant policies in the Local Plan, including those relating to:</p> <ul style="list-style-type: none"> • Biodiversity Net Gain (Policy SE7): Ensuring that development leaves biodiversity in a measurably better state than before. • Biodiversity and Geodiversity (Policy SE8): Protecting and enhancing designated sites, habitats, and species, and promoting ecological connectivity. • Historic Environment (Policy SE9): Conserving and enhancing the significance of heritage assets, including their settings. 	No change required	NULLP1433	T Bostock

	<ul style="list-style-type: none"> • Landscape (Policy SE10): Protecting and enhancing the character, quality, beauty, and tranquillity of the Borough. • Trees, Hedgerows, and Woodland (Policy SE11): Prioritising the retention and protection of existing trees, hedgerows, and woodlands. • Amenity (Policy SE12): Ensuring that developments do not result in unacceptable harm to the amenity of the surrounding area. • Soil and Agricultural Land (Policy SE13): Protecting the best and most versatile agricultural land and promoting sustainable soil management. • Green and Blue Infrastructure (Policy SE14): Enhancing and connecting the Borough's network of green and blue spaces. • Pollution and Air Quality (Policy SE1): Preventing or minimising pollution, including air pollution, and promoting the use of sustainable transport modes. • Flood Risk Management (Policy SE3): Ensuring that development does not increase flood risk and incorporates appropriate mitigation measures. • Sustainable Drainage Systems (Policy SE4): Requiring developments to manage surface water runoff sustainably. • Water Resources and Water Quality (Policy SE5): Protecting and improving the quality of water resources and promoting water efficiency. 			
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	<ul style="list-style-type: none"> • Climate Change (Policy CRE1): Ensuring development is resilient to climate change, minimises energy use and promotes the use of renewable energy. • Renewable Energy (Policy CRE2): Sets out requirements for renewable energy provision and supporting infrastructure. <p>The Council believes that these policies, along with the detailed assessments required at the planning application stage, provide a robust framework for ensuring that the proposed development at CT1 is carried out in a sustainable manner and that any potential environmental impacts are appropriately addressed. The Council will work with developers to ensure that all new development in the Borough minimises its environmental footprint and contributes to a greener, more sustainable future.</p>			
Bells Hollow is a single track.	<p>The Council acknowledges the concerns raised regarding the existing road network surrounding the CT1 site, including the nature of Bells Hollow. The Council confirms that any future planning application for development on CT1 will be required to include a detailed Transport Assessment. This assessment will need to robustly evaluate the impact of the proposed development on the surrounding road network, including Bells Hollow, considering the existing road conditions and anticipated traffic generation. This will also need to give due consideration to the impact on the wider highways network, including an assessment of any impact on junctions serving the site and any necessary improvements. The Transport Assessment will need to demonstrate that the proposed development can</p>	No change required	NULLP1422	C Quinn

	<p>be safely and efficiently accessed without causing unacceptable harm to the local road network or creating dangerous conditions for other road users and will also need to demonstrate that appropriate access can be achieved for emergency service and waste collection vehicles. The Council will work closely with the local highway authority, Staffordshire County Council, to assess the findings of the Transport Assessment and to determine whether any highway improvements are necessary to mitigate the impact of the development. In addition, the Council will expect any development proposals to promote sustainable transport options, in accordance with Policy IN2 (Transport and Accessibility), and to provide appropriate facilities for walking, cycling, and public transport, to reduce reliance on private vehicles.</p> <p>The Council is committed to ensuring that new development is supported by adequate infrastructure and that any potential impacts on the existing road network are appropriately mitigated. The detailed design and layout of the development, including access arrangements and any necessary highway improvements, will be subject to further scrutiny at the planning application stage.</p>			
The site has archaeological history as Saxon brass has been excavated from the field.	The Council acknowledges the concerns raised regarding the potential archaeological significance of CT1 and the presence of previous finds, including Saxon brass. The Council recognises the importance of protecting and, where appropriate, recording any archaeological remains that may be present on the site.	No change required	NULLP1436	J and C Williams

	<p>Policy SE9: Historic Environment requires that development proposals should take account of the significance of any affected heritage assets, including their setting. This includes archaeological remains, whether designated or not. The policy sets out a clear process for assessing and managing potential impacts on heritage assets, including the need for appropriate desk-based assessments and, where necessary, field evaluations.</p> <p>In the case of CT1, any future planning application will need to be supported by a comprehensive Heritage Impact Assessment, as required by Policy CT1 and in line with the provisions of Policy SE9. This assessment will need to include an appropriate desk-based assessment of the site's archaeological potential, considering any previous finds in the area and any other relevant information. Where necessary, a field evaluation, such as a geophysical survey or trial trenching, will also be required to determine the presence, nature, extent, and significance of any archaeological remains on the site.</p> <p>Should any significant archaeological remains be identified, the Council will work with the developer and relevant statutory consultees, including the County Archaeologist, to ensure that appropriate mitigation measures are put in place. This may include preservation in situ, where feasible, or excavation and recording prior to development, in accordance with best practice and relevant guidance. The Council will use planning conditions or planning obligations to secure the implementation of any necessary mitigation measures.</p>			
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	<p>The Council is committed to protecting and enhancing the Borough's rich archaeological heritage and will ensure that any development of CT1 is carried out in a manner that is sensitive to the site's potential archaeological significance.</p>			
<p>I understand that there is a shortage of suitable housing for first time buyers but there is land in Chesterton that has already been purchased but no one has built on yet.</p>	<p>The Council acknowledges the observation regarding potentially undeveloped land in Chesterton. The Council, however, must consider the overall housing needs of the entire Borough when making site allocations within the Local Plan. This includes considering a number of factors, including the identification of an appropriate number of housing allocations, the specific housing requirements of each area, and the availability and suitability of sites to meet those needs. It is important to note that there may be a range of reasons why a particular site has not yet been developed that may fall outside the remit of the planning process. For instance, land ownership, financing, or market conditions may all play a part. The mere fact that a site has planning permission or has been purchased for development does not necessarily mean that it is immediately available or deliverable.</p> <p>The Council has undertaken a thorough site selection process, as part of the evidence base for the Local Plan, to identify the most appropriate and sustainable locations for new housing development, as outlined in the Site Selection Methodology Paper. This process considered a wide range of factors, including the availability of previously developed land, environmental constraints, and infrastructure capacity. It also considered the need to distribute housing across the Borough in accordance with the Settlement</p>	<p>No change required</p>	<p>NULLP1456</p>	<p>T Sherwood</p>

	<p>Hierarchy (Policy PSD2) and the Distribution of Development (Policy PSD3). The inclusion of allocated sites such as CT1 within the Local Plan process provides a degree of certainty that the strategic goals for development set out within the Local Plan will be met.</p> <p>Whilst the Council continues to encourage the development of suitable brownfield sites within the urban area, the evidence demonstrates that it is also necessary to allocate greenfield sites, such as CT1, to meet the Borough's housing requirements over the plan period. The Council also notes that the allocation of CT1 is justified on the basis that there are exceptional circumstances for the release of this land, that the site is in a sustainable location in close proximity to existing services and facilities, and that the allocation of this site is supported by the relevant policy requirements and further details set out within the supporting evidence base. The Council is therefore confident that the allocation of CT1 is both justified and necessary to deliver the overall development strategy set out in the Local Plan. The Council has also taken into consideration the potential environmental impacts of developing the site, including any impacts on biodiversity, and any future development will be expected to provide appropriate mitigation or compensation measures.</p>			
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83. Cross Heath

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

84. Policy CH13 Castletown Grange

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Notes that the site currently comprises vacant, moribund accommodation. States that Aspire recently sold the site and that it's being refurbished for private tenants.	The Council acknowledges Aspire Housing's comment regarding the status of the Castletown Grange site. The Council confirms that the site is allocated for residential development in the Local Plan, as set out in Policy CH13, and that the site's suitability for this use has been carefully considered and is supported by the evidence base. The Council notes Aspire Housing's update regarding the recent sale and refurbishment of the site for private tenants and assumes that this development will proceed in accordance with the allocation policy. The Council supports the rationalisation of sites to provide accommodation within the Borough.	No Changes Proposed	NULLP889	Aspire Housing

85. Policy CH14 Maryhill Day Centre

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

86. Holditch and Chesterton

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

87. Policy CT20 Rowhurst Close

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Tarmac operates a concrete plant in Chesterton. They highlight the importance of safeguarding minerals infrastructure like their plant from conflicting land uses or prejudice to future operations. Tarmac notes their concrete plant is located in Rowhurst Industrial Estate, at the corner of Rowhurst Close and Watermills Road, surrounded by other industrial uses and vacant land. They describe their site operations and strategic location. They reference the NPPF's support for facilitating the sustainable use of minerals and the "agent of change" principle. Tarmac welcomes the inclusion of the agent of change principle in Policy CT20 and considers this consistent with the NPPF.	The Council acknowledges Tarmac Trading Ltd.'s representation regarding Policy CT20 and the importance of safeguarding minerals infrastructure. The Council confirms that the Rowhurst Close site is allocated for employment uses in the Local Plan, consistent with the need to provide a resilient supply of employment land and support economic growth, as set out in Policy CT20 and Policy PSD1 (Overall Development Strategy). The Council recognises the role of Tarmac's concrete plant in Chesterton and the importance of minerals infrastructure for the local economy. The Council further confirms that the allocation policy requires consideration of the relationship of the site to surrounding development, in line with the agent of change principle, as raised by Tarmac, and believes this adequately addresses the potential for conflict between different land uses. The potential for conflicting land uses and the application of the "Agent of Change" principle, have been considered as part of the site allocation process and no issues were raised here in respect of Tarmac's operation at Chesterton.	No change required	NULLP328	Tarmac Trading Ltd

88. Keele

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
KL33 and KL34 would make a valuable contribution towards new development in Keele, meeting the identified need, have limited site constraints and meet the criteria of available, viable and deliverable	The Site Selection Report in the evidence base sets out the rationale for not selecting KL33 and KL34.	No change required.	NULLP591	Montague Evans (On behalf of W and S Summerfield)
Concerned about the harm to heritage assets Keele Hall Registered Park and Garden, Keele Hall Conservation Area, and associated heritage assets, as well as the cumulative impact to these assets through multiple site allocations within a local vicinity	All proposals will be delivered according to Historic Environment policy and HIA as appropriate	No change required.	NULLP586	Historic England

89. Policy KL13 Keele Science Park, Phase 3

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
It should be clear that a landscape buffer is required and why and this should form part of any masterplanning/ planning application submission.	The wording in the policy, as proposed, recognises that part of the science park has been delivered, and the policy supports the delivery of the remaining elements of the site. The Council's Heritage Impact Assessment notes that the development of the site would further add to an already semi-developed area. The policy wording is consistent with the requirements of the Council's Heritage Impact Assessment.	No change required	NULLP534	Historic England
The HIA is very limited in detail with regards to the impacts for Keele Hall RPG and the impact of the development on this asset.	The HIA is appropriate in the consideration of the site for allocation.	No change required	NULLP533	Historic England
Fully supportive of the proposed university site and strategic allocations	The Council acknowledges this response.	No change required	NULLP1060	Asteer Planning (on behalf of Persimmon Homes)
Further details about the link road should be provided about this	The site policy is clear that the link road is	No change required	NULLP970	Keele Parish Council

proposal and should access be restricted to sustainable transport (foot, cycle, buses) and potentially, University employees.	intended to support the allocation of sites KL13, KL15 and TB19 in the Plan, facilitating, through the allocations a link road from the A525 Keele Road to Whitmore Road.			
All developments on Green Belt Land are unsound and should be removed from the Local Plan as they have a negative effect on net biodiversity net gain, open space, climate change, air quality, noise pollution, mental and physical health	The exceptional circumstances case for Green Belt release is set out in the Plan Strategy Housing & Employment topic papers [ED031/ED031]	No change required	NULLP759	C Hoban
Would like to further understand the development with regards to the potential impacts on the lowland fen habitat.	The policy as drafted, in criterion 10 requires ecological buffers from the site to Barkers Wood / Rosemary Hill Wood and Springpool Wood. Detailed studies would accompany any planning application.	No change required	NULLP1320	Natural England
The University is one of the main employers. If the University is to continue to grow, it should have access to development space	The Council acknowledges this response.	No change required	NULLP639	Cllr R Gorton
The housing target for Keele is not based on population data	The Housing and Economic Needs Assessment has assisted the Council in establishing its overall	No change required	NULLP125	T Wright

	housing targets for the Borough, consistent with the NPPF December 2023 version.			
When the Local Plan was drawn up, there was no government policy to build on Green Belt, this will also hinder the borough achieving net zero	The NPPF states that Green Belt can be used in exceptional circumstances The Council's case for Green Belt release is set out in the Plan Strategy Employment and Housing Topic Papers [ED031/ED032]. Any future site allocation would also be the subject of policies in the Local Plan, including the climate change policy.	No change required	NULLP125	T Wright

90. Policy KL15 Land South of A525 Keele

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The housing target for Keele is not based on population data.	The Housing and Economic Needs Assessment has assisted the Council in establishing its overall housing targets for the Borough, consistent with the NPPF December 2023 version.	No change required	NULLP126	T Wright
When the Local Plan was drawn up, there was no government policy to build on Green Belt, this will also hinder the borough achieving net zero	The NPPF states that Green Belt can be used in exceptional circumstances The Council's case for Green Belt release is set out in the Plan Strategy Employment and Housing Topic Papers [ED031/ED032]. Any future site allocation would also be the subject of policies in the Local Plan, including the climate change policy.	No change required.	NULLP126	T Wright
The avoidance, mitigation and enhancement measures identified in the Council's own heritage impact assessment need to be fully considered and included within Clause 7 of the policy.	The policy requires a Heritage Impact Assessment to be produced, informed by the considerations of the assessment completed by the Council. It is considered that criteria 7,8 and 11 reflect the outcomes of the Heritage Impact Assessment.	No change required	NULLP536	Historic England
The HIA is very limited in detail with regards to the impacts for Keele Hall	Support for the archaeological assessment is noted. The policy	No change required	NULLP536	Historic England

RPG and the impact of the development on this asset	requires a Heritage Impact Assessment to be produced, informed by the considerations of the assessment completed by the Council. It is considered that criteria 7,8 and 11 reflect the outcomes of the Heritage Impact Assessment. The policy requires a detailed HIA at planning application stage (criterion 6).			
Any development in KL15 cannot be justified while space exists in KL13 or other parts of Keele such as Horwood old car park	The strategic employment sites assessment [ED002] has considered the merits of the site alongside the site selection report and other appropriate evidence. This has determined that the site is suitable for allocation.	No change required	NULLP165	T Jervis
KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland	Noted. Criterion 10 requires appropriate ecological buffers to be created.	No change required	NULLP1321	Natural England
The site does not currently have safe pedestrian or cycle access adjacent to the site, where site end users may reliant upon less sustainable modes of transport including private car use.	Criterion 5 requires that the site deliver walking and cycling links within and links into appropriate linkages on the edge of the site.	No change required	NULLP1321	Natural England
All developments on Green Belt Land are unsound and should be removed from the Local Plan as they have a negative effect on net biodiversity net gain, open space,	The exceptional circumstances case for Green Belt release is set out in the Plan Strategy Housing & Employment topic papers [ED031/ED031]	No change required.	NULLP761	C Hoban

climate change, air quality, noise pollution, mental and physical health				
Further details about the link road should be provided about this proposal and should access be restricted to sustainable transport (foot, cycle, buses) and potentially, University employees.	The site policy is clear that the link road is intended to support the allocation of sites KL13, KL15 and TB19 in the Plan, facilitating, through the allocations a link road from the A525 Keele Road to Whitmore Road.	No change required	NULLP970	Keele Parish Council
Fully supportive of the proposed university site and strategic allocations	The Council acknowledges this response.	No change required	NULLP1060	Asteer Planning (on behalf of Persimmon Homes)
ED011 Strategic Transport Assessment indicates there is an unacceptable residual traffic impact on A525 Keele Road	Noted, this provides further support for the requirement of the link road, as mitigation for such impacts.		NULLP1083	Staffordshire County Council

91. Kidsgrove and Ravenscliffe

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Provides an example of a "discarded" site (RC14) that they believe needs more justified consideration. The site has a history of SHELAA submissions and was analysed in the Green Belt Assessment as having a "weak" contribution but recommended for further consideration due to its potential for small-scale growth adjacent to Kidsgrove. The site is brownfield with a former farm complex now in commercial use. It was considered for allocation in the Regulation 18 draft (for 6 dwellings) but is not included in the Regulation 19 draft. Argues the site <i>should</i> be allocated based on several factors, including its brownfield status, the need for smaller sites to meet 5-year housing supply, Stoke's housing needs, and the slow delivery of large strategic sites. Cites the NPPF and Levelling Up & Regeneration Bill 2023 to support their argument.	The Council acknowledges Wardell Armstrong LLP's representation regarding site RC14 and its potential for development. The Council maintains that the site allocations included in the Local Plan are those best suited to meet the Borough's development needs, as demonstrated through a robust site selection process. The suitability of each proposed allocation, including considerations of deliverability, access to services, and relationship to Green Belt and other constraints, has been thoroughly assessed as set out in the site allocations policies (Chapter 14) and supporting text. Sites not allocated within the plan, such as RC14, were considered but not deemed appropriate for allocation at this stage for reasons set out in the evidence base. The Council notes the consultant's comment that the site could be developed quickly; however, speed of delivery is only one factor amongst many considered in the site selection process.	No Changes Proposed	NULLP248	Wardell Armstrong LLP
Notes that Site RC8 is referenced on Map 7 (Kidsgrove Ward Map) as an allocation for 6 dwellings (as in the Regulation 18 Draft), but <i>not</i> referenced in the plan document, calling this a plan anomaly.	The Council acknowledges Wardell Armstrong LLP's comment regarding site RC8 and its inclusion on Map 7 (Kidsgrove Ward Map). RC8 is reflected in appendix 4 as a commitment since March 2023.	No Changes Proposed	NULLP247	Wardell Armstrong LLP
Objects to all developments on greenfield sites in Audley Parish and elsewhere, listing various negative impacts. Argues against the "presumption in favour of sustainable	The Council acknowledges Mr. Austin's wide-ranging comments regarding the Local Plan and its approach to development. The Council maintains that the Local Plan, including the site allocations	No Changes Proposed	NULLP308	J Austin

development" in the NPPF (paragraphs 11-14), suggesting it pressures local authorities to demonstrate willingness to develop, even if unnecessary. Questions the need for development given the national oversupply of housing and provides data from the Community Planning Alliance. Raises concerns about the growing UK population and the lack of initiatives to address it. Argues against specific proposed developments (AB2, TK30, KL15) due to their size and location in the Green Belt, and for several other sites on various grounds. Discusses the decline of manufacturing/production jobs and the rise of logistics centres, questioning the need for "big box" developments like AB2 and TK30. Cites a perceived housing surplus based on Community Planning Alliance data and questions the need for further housing development.	proposed for Kidsgrove and Ravenscliffe, is based on a sound and evidence-based strategy for meeting the Borough's development needs while protecting the environment and promoting sustainable communities, as required by the NPPF. The specific concerns raised regarding the presumption in favour of sustainable development, national housing oversupply, population growth, specific site allocations, employment trends, and the availability of brownfield sites have been noted, and the Council has considered them. The Local Plan addresses these overarching issues through its strategic policies and site-specific allocations, demonstrating a balanced approach to meeting local needs while adhering to national policy and guidance. The Council is committed to engaging with residents and stakeholders throughout the Local Plan process and values the input received during the consultation periods.			
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92. Policy KG6 William Road

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

93. Site G&T 11 Land at Hardings Wood Road, Kidsgrove

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Planning permission was for a Showman site, not Gypsy and Traveller	The site allocation is for Travelling Showperson uses.	No change required.	NULLP67	K Stanworth
Insert following text into policy 'The layout of development at the site must consider proximity to sewers within the site, and adjacent to the boundaries of the site and provide for access and appropriate distances away from such assets to allow for maintenance, repair, and replacement. The location of any plots, built development or storage of materials or vehicles within the off-set distance for these assets will not be acceptable.'	Criterion 4 requires the use of permeable materials and also a drainage strategy, to manage surface run off.	No change required	NULLP1043	United Utilities

94. Knutton

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

95. Policy KS3 Land at Blackbank Road, Knutton

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The playing field site should be replaced in line with the requirements of Policy SE6 and NPPF paragraph 103.	Criterion 12 requires the consideration of alternative sports provision, recognising the site's most recent use as school playing fields	No change required	NULLP218	Sport England
Please consider setting aside a generous area as public open space preferably on the west side to include a no mow grass area for the public to walk dogs etc, and the existing hedge row for wildlife cover with gated access.	Noted	No change required	NULLP1139	M Cotterill
Add 'A Minerals Safeguarding Area assessment being prepared and submitted for the site' to policy	Noted	An additional criterion is proposed to be added to the policy to recognise the need for a mineral safeguarding area assessment	NULLP1100,	Staffordshire County Council

96. Policy KS11 Knutton Community Centre, High Street

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Planning permission recently granted to Aspire for KS11 and KS17 which would provide 75 affordable homes.	Noted. KS11 has planning permission for 21 residential dwellings (24/00023/FUL)	No change required.	NULLP896	Knights (on behalf of Aspire Housing)

97. Policy KS17 Knutton Recreation Centre, Knutton Lane

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
A ball strike risk assessment should be undertaken to assess any impact on the golf club.	The site has a resolution to grant planning permission for residential development (ref 23/00771/FUL)	No change required.	NULLP217	Sport England
The playing field site should be replaced in line with the requirements of Policy SE6 and NPPF paragraph 103.	See above	No change required.	NULLP217	Sport England
KS17 would include loss of playing fields and other village amenities.	See above	No change required.	NULLP320	Dr J Austin
Planning permission recently granted to Aspire for KS11 and KS17 which would provide 75 affordable homes.	The Council recognises Aspire's representation regarding planning permission recently granted.	No change required	NULLP897	Knights (on behalf of Aspire Housing)

98. Policy KS18 Land North of Lower Milehouse Lane

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Concerns over the development affecting parking areas that the Church currently utilises.	This is a matter that can be considered at a planning application stage.	No change required	NULLP124	S Newman
KS18 is part of Knutton's Masterplan	The Council recognises Aspire's representation regarding KS18's inclusion in Knutton's masterplan.	No change required	NULLP898	Knights (on behalf of Aspire Housing)

99. Policy KS19 Land at Knutton Lane

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
KS19 is part of Knutton's Masterplan	The Council recognises Aspire's representation regarding KS19's inclusion in Knutton's masterplan	No change required	NULLP899	Knights (on behalf of Aspire Housing)

100. [Loggerheads](#)

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

101. Policy LW53 Land at Corner of Mucklestone Wood Lane

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
<p>Unsustainable Location/Lack of Infrastructure/Strain on Services: Numerous respondents object to the LW53 allocation, arguing that Loggerheads lacks the necessary infrastructure and services to support a significant increase in housing. Concerns focus on limited public transport, inadequate road access and safety, insufficient capacity at schools and healthcare facilities, limited local amenities and employment opportunities, and the potential strain on utilities. They argue the development would exacerbate existing issues with traffic congestion, pressure on services, and promote over-reliance on cars due to a lack of sustainable transport options. Some cite the Council's previous refusal of a similar application as further evidence of the site's unsuitability.</p>	<p>The Council acknowledges the significant concerns raised regarding the suitability of Loggerheads as a location for the proposed LW53 development. The Council confirms that the site's overall suitability for residential development has been assessed, in accordance with national and local planning policy. This assessment considered local housing need, the availability and capacity of existing services and infrastructure (including transport, schools, healthcare, utilities, and local amenities), site accessibility, environmental constraints, and the potential impacts on the character and setting of the local area. Specific details relating to traffic management, road safety improvements, and access arrangements, including the junction of Mucklestone Wood Lane and the A53 and provision for pedestrians and cyclists, will be addressed in more detail during the planning application process. Concerns regarding the future capacity of local schools, healthcare facilities, and other key services were considered at a high level during the site assessment, and any specific proposals for increasing capacity and mitigating the impact of development on these services will be addressed during the assessment of a planning application for this site, as well as any associated contributions secured through planning obligations. The allocation of LW53 is consistent with the strategic distribution of housing outlined</p>	<p>No change required</p>	<p>NULLP8 NULLP32 NULLP7 NULLP31 NULLP29 NULLP26 NULLP54 NULLP46 NULLP44 NULLP36 NULLP47 NULLP51 NULLP50 NULLP74 NULLP73 NULLP100 NULLP91 NULLP99 NULLP75 NULLP68 NULLP71 NULLP162 NULLP310</p>	<p>P Franklin J Hughes D Franklin R Bignell S Simkin J Dunlevy A H Wilson D Carter E Stevenson T Jones G Silvester S Allen P Allen J Parr B Birch A Smith M Kingston J Smith P Oakley PS Wade M and L Mason K Wilson J Austin</p>

	in Policy PSD3, which sets borough-wide housing targets informed by a strategic assessment of housing need. For more detailed information on the site selection process and the Council's assessment of LW53, please refer to Policy LW53, the supporting text, and associated evidence base documents.			
Loss of Green Belt/Environmental Impact: Many respondents object to developing LW53 due to its Green Belt location and the resulting loss of greenfield land, open space, and countryside views. They express concern about the negative environmental consequences, including loss of biodiversity, harm to trees/hedgerows, increased traffic/pollution, and the visual impact on the landscape. They argue that protecting the Green Belt is crucial for preventing urban sprawl, safeguarding the countryside, and preserving the character of Loggerheads.	The Council acknowledges the concerns regarding LW53. The site is not in the Green Belt. Specific details relating to ecological impacts, landscape character, and mitigation measures will be assessed during the planning application process, informed by the evidence base and the Environmental Impact Assessment Regulations 2017, and in line with Local Plan policies SE7, SE8, SE9, and SE10. For further justification and details, please see Policy LW53, the supporting text, and associated evidence base documents.	No change required	NULLP8 NULLP32 NULLP7 NULLP31 NULLP29 NULLP26 NULLP54 NULLP46 NULLP44 NULLP36 NULLP47 NULLP51 NULLP50 NULLP74 NULLP73 NULLP100 NULLP91 NULLP99 NULLP75 NULLP68 NULLP71 NULLP162 NULLP310 NULLP1495	P Franklin J Hughes D Franklin R Bignell S Simkin J Dunlevy A H Wilson D Carter E Stevenson T Jones G Silvester S Allen P Allen J Parr B Birch A Smith M Kingston J Smith P Oakley PS Wade M and L Mason K Wilson J Austin W and L Friend
Need for Housing/Alternative Locations: Some respondents question the strategic need for the amount of development proposed for Loggerheads and the basis of housing allocation	The Council acknowledges the questions regarding the need for housing in Loggerheads and the suggestion to prioritise brownfield sites. The housing numbers suggested for Loggerheads	No change required	NULLP8 NULLP32 NULLP29 NULLP26	P Franklin J Hughes S Simkin J Dunlevy

figures in Policy PSD3. They suggest prioritising brownfield sites over greenfield/Green Belt allocations and express concerns about the methodology used to assess housing need.	(Policy PSD3) is informed by a strategic assessment of housing need and is considered appropriate and justified. The Council prioritises brownfield sites in line with the NPPF; however, meeting housing targets necessitates releasing greenfield sites in sustainable locations like LW53. The specific allocation contributes towards meeting this identified need.		NULLP54 NULLP47 NULLP51 NULLP74 NULLP73 NULLP91 NULLP99 NULLP71 NULLP162 NULLP310 NULLP1494	A H Wilson G Silvester S Allen J Parr B Birch M Kingston J Smith M and L Mason K Wilson J Austin W and L Friend
Traffic and Access: Many respondents express significant concern about the potential traffic impact of LW53, focusing on increased traffic volume and congestion on Mucklestone Wood Lane and other local roads, dangers posed by the junction of Mucklestone Wood Lane and the A53, inadequate pedestrian/cycling provision, lack of parking and the need for associated improvements.	The Council acknowledges the concerns raised regarding the potential impact of the proposed LW53 development on traffic and access. Traffic and access issues were considered at a strategic level as part of the site selection process. Any planning application for LW53 will be required to demonstrate compliance with the suite of policies included in the Local Plan, providing specific proposals for road safety, traffic calming, junction improvements, and pedestrian/cycling enhancements as appropriate. The Council notes the concerns regarding traffic volumes, congestion, and road safety, particularly at the A53 junction, and confirms that these matters will be rigorously assessed during the planning application process, considering the requirements of local and national planning policy and guidance, including those set out in the NPPF. For more detailed information on the Council's transport policies and the site access strategy, please refer to Policy LW53, supporting text, and associated evidence base documents.	No change required	NULLP8 NULLP32 NULLP31 NULLP26 NULLP54 NULLP46 NULLP310 NULLP1495	P Franklin J Hughes R Bignell J Dunlevy A H Wilson D Carter J Austin W and L Friend
Impact on Local Character/Village Setting: Respondents express concern that the LW53 development will change the character of	The Council acknowledges the concerns about the potential impact on Loggerheads' character and setting. The visual impact, integration with the	No change required	NULLP7 NULLP29 NULLP71	D Franklin S Simkin M and L Mason

Loggerheads from a rural village to a more suburban environment, impacting quality of life and potentially increasing car dependency.	existing built environment, and effect on the village's rural character were considered during the site assessment process. Specific proposals related to layout, design, landscaping, and open space provision will be assessed at the planning application stage in accordance with Policy PSD7 (Design) and Policy SE14 (Green and Blue Infrastructure). Whilst acknowledging some change is inevitable, the Council maintains that the development will be sensitively integrated and minimise negative impacts.		NULLP1495	W and L Friend
Concerns about White House Farm: Some respondents are concerned about the potential visual impact of the LW53 development on White House Farm, a nearby Grade II listed building, and farm.	The Council acknowledges the concerns regarding the potential impact on White House Farm. The relationship between the proposed development and the listed farmhouse and its setting was assessed as part of the Heritage Impact Assessment (HIA), referenced in Policy LW53. Specific design and mitigation proposals will be assessed during the reserved matters or full planning application process, in accordance with Policy SE9 (Historic Environment).	No change required	NULLP540 NULLP1495	Historic England W and L Friend
Supports the LW53 allocation but suggests increasing the dwelling capacity from 130 to 150, reflecting the capacity pursued in their planning application (currently under appeal). Provides a detailed justification addressing each of the policy criteria.	The Council thanks Shropshire Homes for their support of the LW53 allocation. The approach to the site is detailed in the Local Plan, following the site selection process.	No change required	NULLP917	Shropshire Homes
Requests additional details from the Heritage Impact Assessment be included in the plan to address mitigation measures and the protection of long-range views to/from White House Farmhouse.	The Council acknowledges Historic England's recommendation to include additional detail in LW53 regarding the mitigation measures and protection of long-range views to/from White House Farmhouse. The Council confirms that these matters, and the potential impact of development on the setting of designated heritage assets, will be	No change required	NULLP540	Historic England

	given due consideration during the detailed design stage of any planning application for the site. The Local Plan sets the strategic framework for development at LW53, and specific mitigation measures and design solutions to protect views and minimise any adverse impacts on nearby heritage assets will be evaluated through the full planning application process, as outlined in Policy LW53. The assessment will be undertaken in accordance with Policy SE9: Historic Environment, and the Council will take Historic England's comments into account at that stage.			
Requests details of specific mitigation measures (e.g., evaluation trenching) be included in Policy LW53, Clause 4.	The Council acknowledges Historic England's recommendation to include details of specific mitigation measures, such as evaluation trenching, in Policy LW53, Clause 4. The Council confirms that the need for, and nature of, any archaeological investigation and recording, including the use of evaluation trenching or other appropriate techniques, will be considered as part of the planning application process for the site, as per Policy SE9: Historic Environment, and the Framework provided within this policy. The Local Plan sets the strategic framework for development at LW53, and specific mitigation measures related to archaeological remains will be assessed through the planning application and any associated heritage assessments.	No change required	NULLP538	Historic England
Requests details of specific mitigation measures (e.g., tree/hedgerow retention) be included in Policy LW53, Clause 3.	The Council acknowledges Historic England's recommendation to include details of specific mitigation measures, such as tree/hedgerow retention, in LW53, Clause 3. The Council confirms that the existing policy wording requires development proposals to protect and enhance existing landscape features, including trees and	No change required	NULLP539	Historic England

	<p>hedgerows, and to provide appropriate mitigation for unavoidable losses, in accordance with Policy SE11: Trees, Hedgerows and Woodland. These requirements sufficiently address the need to consider such measures during the design stage, and specific proposals for retention, protection, or mitigation will be evaluated as part of the planning application process.</p>			
<p>A wide-ranging response covering numerous policies. For LW53, they note the site's location within the Influence Zone (IRZ) of Burnt Wood SSSI, triggering consultation requirements.</p>	<p>The Council acknowledges Natural England's extensive representation regarding LW53. The Council understands the concerns raised about the potential impacts on designated sites, including Burnt Wood SSSI, as well as broader environmental considerations such as air and water quality, the loss of agricultural land, and potential pressures on the Nature Recovery Network. The Council confirms that these factors, along with housing need and other relevant considerations, were carefully evaluated during the Local Plan process. The Habitats Regulations Assessment, Strategic Flood Risk Assessment, Water Cycle Study, and policies relating to air and water quality (SE1 and SE5), landscape (SE10), soil and agricultural land (SE13), and biodiversity net gain (SE7) all demonstrate the Council's commitment to sustainable development and its efforts to minimise environmental harm. The Council believes that the allocation of LW53 strikes an appropriate balance between meeting the identified housing need and protecting the Borough's valuable environmental assets. The Council values Natural England's expertise and will continue to engage with them to ensure that any potential impacts of the proposed allocation are fully mitigated.</p>	<p>No change required</p>	<p>NULLP1322</p>	<p>Natural England</p>

102. Madeley and Betley

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Expansion of the school is not opposed subject to a sufficient traffic management plan being put in place. Concerns however at the exacerbation of traffic volumes & air quality issues.	Noted. In accordance with Policy IN2, Transport Assessments & Travel Plans should accompany applications likely to generate significant travel movements.	No change required	NULLP205	Madeley Parish Council (N Lovell)
As there is a public sewer that passes through the site, it is recommended that a site-specific policy is included for the potential expansion of Madeley High School, with a detailed criterion included that considers the proximity of the sewer.	It is considered that the existing policies in the Local Plan can provide for an appropriate policy context for this matter to be considered once further details are confirmed.	No change required.	NULLP1044	United Utilities (A Leyssens)

103. Policy MD29 Land North of Bar Hill

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Access point is a blind bend	A Strategic Transport Assessment (ED011) has been prepared to consider the allocations in the Plan and identify any mitigation measures required	No change required	NULLP169	J Wedgewood
The site is an area for biodiversity	Noted. Biodiversity net gain is a key component of the Local Plan as detailed in Policy SE7	No change required	NULLP169	J Wedgewood
Infrastructure already at capacity	Issues considered within the Infrastructure Delivery Plan	No change required	NULLP169	J Wedgewood
Insert a clause within this policy regarding the need for appropriate archaeological assessment, as the HIA has identified that there is a medium potential for archaeological remains in the area.	Noted	To add a new criterion (13) as follows: - <u>13. A programme of archaeological recording to investigate the nature of and significance of any archaeological remains that survive on the site</u>	NULLP541	Historic England
This site is not within the village envelope and development of the site would result in severe adverse impact on traffic safety and capacity.	ED007 Settlement Boundary Review elucidates the Council's stance on what it considers represents appropriate & justified amendments to boundaries of areas,	No change required	NULLP206	Madeley Parish Council

	including Madeley. MD29 itself is in close proximity to key services, amenities, and infrastructure, served by public transport.			
The site MUST require road junction improvements.	A Strategic Transport Assessment (ED011) has been prepared to consider the allocations in the Plan and identify any mitigation measures required. These issues are also addressed within the Policy's Supporting Information (para 13.144)	No change required	NULLP204	Madeley Parish Council
The site is affected by severe flooding issues, not just a limited part.	Issues considered within evidence base document ED013 Strategic Flood Risk Assessment	No change required	NULLP203 NULLP169 NULLP429	Madeley Parish Council J Wedgewood R Nutbeem
The methodology for site selection has resulted in less sustainable options being presented and has not properly considered more sustainable options within the Green Belt which are considered to have less harm on the wider landscape and open countryside to meet development needs (such as Site MD12A).	The Council maintains that the site allocations included in the Local Plan are those best suited to meet the Borough's development needs, as demonstrated through a robust site selection process. The suitability of each proposed allocation, including considerations	No change required	NULLP985	Madeley Heath Developments

	of deliverability, access to services, and relationship to Green Belt and other constraints, has been thoroughly assessed as set out in the site allocations policies (Chapter 13) and supporting text. Sites not allocated within the plan, such as MD12 (as amended), were considered but not deemed appropriate for allocation at this stage for reasons set out in the evidence base.			
Paragraph 13.141 should be amended to reference Madeley and Madeley Heath as the rural centre, not Madeley and Betley	Presentationally in the Local Plan, the Plan presents sites on a ward basis. Therefore, reference to Madeley and Betley in this context is considered appropriate.	No change required	NULLP1008 NULLP1009	Lone Starr Land Ltd Graham Ward Family Trust
To make optimum use of the land required in the NPPF, the number of dwellings should be amended to 155	The amount of development proposed in the Plan is reflective of the outcomes of the site selection process and outcomes	No change required.	NULLP1008 NULLP1009	Lone Starr Land Ltd Graham Ward Family Trust
A masterplan has been prepared and submitted in support of the	It is noted that a planning application has		NULLP1008 NULLP1009	Lone Starr Land Ltd Graham Ward Family Trust

planning application and should be referenced in the policy	been submitted on the site for 155 dwellings (reference 23/00979/OUT). This application was resolved for approval, subject to a S.106 at Planning Committee on the 3 rd December 2024			
The land on bar hill is Green Belt – fully agricultural, no grey or brown site influences whatever. With farming being a national security (food) concern now. Removal for houses seems contrary.	The site is not in the Green Belt. Issues of best & most versatile agricultural land have been considered in conjunction with Natural England in their role as a prescribed body under the Duty to Cooperate. This issue is also a component factor in the determination of the respective merits (or otherwise) of sites	No change required	NULLP429	R Nutbeem
Infrastructure such as expansion of the high school should be built before any housing	Issues considered within evidence base document Infrastructure Delivery Plan. Supporting Information to Policy IN1 makes explicit reference to the policy's aim of ensuring that relevant infrastructure to accommodate development is provided	No change required	NULLP430	R Nutbeem

	in a timely and coordinated way.			
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104. Newchapel and Mow Cop

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

105. Policy NC13 Land West of Bullockhouse Road, Harriseahead

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
There are well known views across the site, known as the promenade. Building houses in NC13 will be intrusive. The loss of semi-rural land.	Criterion 4 requires the layout and development of the site to be landscape led to minimise impacts.	No change required.	NULLP1224	D Barlow
'Financial contributions to improvements in the capacity of local schools and health facilities' is not clear and does not demonstrate if this contribution will be sufficient.	The financial contributions required will be set out during the planning application process.	No change required.	NULLP1224	D Barlow
Plethora of wildlife on site that needs to be assessed and protected.	This will be considered in line with the requirements of policies in the Local Plan on ecology, BNG and policy SA1 General Requirements.	No change required.	NULLP174 NULLP174	K Millward R Cooper
Green belt and graded listed buildings are heritage asset that should not be removed	There are no direct heritage assets on site. The exceptional circumstances for Green Belt release are set out in the Plan Strategy Housing Topic Paper [ED031].	No change required.	NULLP174	K Millward
Increased pressure on road network, especially as no amenities or employment opportunities close to development and no regular bus service	The Council acknowledges this response. Paragraph 13.160 and criteria 3 of the policy stipulates that	No change required.	NULLP174 NULLP461 NULLP644 NULLP1010 NULLP435	K Millward P Leese D Mackay D Fenton R Cooper

	a financial requirement will be required to support local bus provision			
Increased pressure to local Health Centre	Infrastructure requirements have been established in the infrastructure delivery plan	No change required	NULLP463 NULLP644	P Leese D Mackay
No traffic survey carried out	In line with policy SA1 general requirements, transport assessments will be required as appropriate. A strategic transport assessment has been completed which has considered the impact of all proposed allocations on the local road network.	No change required	NULLP872 NULLP461 NULLP644 NULLP1010 NULLP174	A Ramsbottom P Leese D Mackay D Fenton R Cooper
No environmental survey carried out	In line with policy SA1 general requirements, relevant habitats and species surveys will be required in accordance with Policy SE8	No change required	NULLP872	A Ramsbottom
Need to investigate Brownfield sites first	The Council, as part of the site selection process, has investigated previously developed land sites and allocated them, where suitable and possible to do so.	No change required	NULLP872 NULLP644 NULLP1010 NULLP435	A Ramsbottom D Mackay D Fenton R Cooper

Add criterion 'Development layout will consider proximity to the sewer within the site and provide for access for maintenance, repair and replacement, and appropriate offset distances from the assets. Applicants must not assume that the sewer can be diverted.'	Criterion 5 considers all types of flood risk, including surface water flooding.	No change required	NULLP1045	United Utilities
Amend criterion 5 'A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account of flood risk from all sources including surface water flooding and risk,'	The current wording for criterion 5 is considered to be appropriate	No change required	NULLP1045	United Utilities
Amend paragraph 13.162 'There are a range of sewers on or close to the site which are identified as at risk of flooding. There are also records of flooding incidents in the wider area. This The sewers and the risk of flooding from them will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. Applicants must engage with the relevant provider United Utilities to consider the detailed design of the site and drainage details. to ensure that development is not located in an area at risk of flooding from the public sewer. Applicants must demonstrate that the proposed development would be safe and not	The existing wording for paragraph 13.162 is considered to correctly draw attention to the location of sewers on the site and the need to provide appropriate drainage and other details.	No change required	NULLP1045	United Utilities

<p>lead to increased flood risk. Applicants should not assume that the sewers can be diverted, or that any levels can change on top of the sewers, as such proposals can negatively affect hydraulic performance and increase or displace flood risk. Any risk of sewer flooding could affect the developable area of the site and the detail of the design. Applicants should consider site topography and any exceedance flow paths. Careful consideration will need to be given to site topography and the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; overland flow paths and the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Resultant layouts and levels should take account of such existing circumstances. In accordance with national and Local Plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk.'</p>				
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No explanation as to why some sites have been removed and others have stayed in. Green Belt site selection has not been transparent.	The Council's site selection process is set out in the ED029 Site Selection Report in the evidence base	No change required.	NULLP1010	D Fenton
Whole selection process needs to be subject to independent scrutiny	The Local Plan and all additional evidence including the Site Selection Report will be subject to independent scrutiny through the examination of the Local Plan.	No change required.	NULLP1010	D Fenton
The site can be delivered in line with policies and criteria set out in the Final Draft Local Plan	The Council acknowledges this response.	No change required.	NULLP668	Knights (on behalf of Bloor Homes)

106. Silverdale

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Will the masterplan for Keele Golf Course provide habitat protection?	SP11 seeks to retain a large proportion of the former Keele Golf course as a country park	No change required	NULLP43	S Macdonald
The Local Plan provides a huge reduction in Green Belt in Silverdale and there isn't an exceptional circumstance for this, given that affordability in the Borough is low.	The exceptional circumstances case is set out in the Plan Strategy Housing Paper [ED031]	No change required	NULLP43	S Macdonald
The amount of development in Silverdale undermines its character.	The site allocation proposed at SP11 requires the production of a masterplan and design code to support its overall delivery.	No change required	NULLP43	S Macdonald
The infrastructure in Silverdale cannot cope with additional development	The Local Plan is supported by an infrastructure delivery plan which has identified, in policy, those infrastructure elements required to support the site. This has included measures such as the provision of a primary school / health centre on site SP11.	No change required	NULLP19 NULLP322	CT Lomax L Rowley

107. Policy SP2 Cheddar Drive

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Consider including a retail outlet on site to serve residents on the estate, who use unreliable bus services to get to a shop. Before demolition, the site had a shop.	The site has been considered through the site selection report for residential uses.	No change required	NULLP161	M Gleaves
Aspire expect to complete the submission of planning for 14 affordable homes by November 2023.	The Council acknowledges this response.	No change required	NULLP900	Knights (on behalf of Aspire Housing)
The infrastructure in Silverdale cannot cope with additional development	The Local Plan is supported by an infrastructure delivery plan which has identified, in policy, those infrastructure elements required to support the site.	No change required	NULLP19 NULLP322	CT Lomax L Rowley

108. Policy SP11 Lyme Park

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The density of properties in SP11(3) is high	The density of the site is considered appropriate and will also be informed by design coding and detailed masterplanning of the site.	No change required.	NULLP13	A Challinor
There are no appropriate access routes to SP11(3) given the surrounding roads having cars parked on either side of the road and some with traffic calming measures already in place.	The access into the site is considered to be suitable (or can be made suitable) to support appropriate access into the site	No change required	NULLP13 NULLP210	A Challinor A R J Price
The additional traffic from the development will have a major impact on road congestion	The Strategic Transport Assessment [ED011] has considered the impacts of the site allocations in the Plan on the road network.	No change required	NULLP13 NULLP28 NULLP64 NULLP116 NULLP164 NULLP239 NULLP1219 NULLP1479 NULLP438 NULLP344 NULLP831 NULLP832 NULLP87	A Challinor C Botfield E Phoenix Dr Y Howells T Jervis T Whally T Fourier Save Our Green Space A Finch M A Nadin D Leech E Leech C Mrozicki

All access points should be situated on the Keele main road, avoiding the village.	The wider site has been split into a number of individual parcels. A couple of parcels within the wider allocation access into Silverdale. This approach has been tested through the Strategic Transport Assessment [ED011]	No change required	NULLP28 NULLP1219 NULLP479 NULLP660	C Botfield T Fourier L Dale D Finney
The infrastructure in Silverdale cannot cope with additional development	The Local Plan is supported by an infrastructure delivery plan which has identified, in policy, those infrastructure elements required to support the site. For example, it has identified the need for additional school and health provision directly on site.	No change required	NULLP20 NULLP660 NULLP831 NULLP832 NULLP87 NULLP322	CT Lomax D Finney D Leech E Leech C Mrozicki L Rowley
The proposed access route on the racecourse poses a safety risk to the children's primary school on Park Road	The development proposals will be supported by additional assessment(s) such as a transport assessment undertaken at the planning application stage.	No change required	NULLP28 NULLP210 NULLP660 NULLP386	C Botfield A R J Price D Finney Cllr J Brown

Disrupting wildlife including kestrels and bats	Ecological buffers are supported through policy SP11 7(b). Policy SA1 general requirements supports the need for additional ecological surveys as and when planning applications come forward on the site.	No change required	NULLP64	E Phoenix
Can the borough justify such a large development on greenbelt land?	The exceptional circumstances for the release of Green Belt are included in the Plan Strategy Topic Paper for Housing [ED031]	No change required	NULLP87	C Mrozicki
How will the overall development affect air quality?	Policy SA1 general requirements requires appropriate air quality assessments. Criterion 10 also requires the submission of an odour assessment and potential mitigation given adjacent farm and industrial uses.	No change required	NULLP87	C Mrozicki
Has there been sufficient surveys done to justify the destruction of wildlife and their habitats?	Policy SA1 general requirements supports the need for additional ecological surveys as and when planning	No change required	NULLP87	C Mrozicki

	applications come forward on the site.			
What is the impact of Walleys Quarry going to be on this development?	The occupation of SP11(4) is dependent on the cessation of the disposal of non-hazardous waste at the Walley's Quarry Landfill Site. The policy also includes appropriate criterion on odour and other relevant assessments to mitigate for any impacts	No change required	NULLP87	C Mrozicki
Have you asked experts such as sociologists what more you could and should do given the size and transformative nature of the park site?	The Council has sought appropriate advice and evidence for the development of the Local Plan. This has not included sociologists, to date.	No change required.	NULLP102	C Harrison
Taking away a large area of open space, that should be preserved	A large proportion of the site is retained for a Country Park	No change required	NULLP116 NULLP64 NULLP1479 NULLP660	Dr Y Howells E Phoenix Save Our Green Space D Finney
Concerned about the drainage and sewerage removal which is already struggling with old pipe work	Criterion 8 considers flood risk on the site, including from surface water flooding.	No change required	NULLP116 NULLP660 NULLP386	Dr Y Howells D Finney Cllr J Brown
There are many brownfield sites that should be used first before Green Belt land	The Council has assessed all available brownfield sites first	No change required	NULLP116 NULLP164	Dr Y Howells T Jervis T Whally

	and will only go into the Green Belt in exceptional circumstances as outlined in the NPPF. Further information on the site selection process is available in the ED029 Site Selection Report in the evidence base.		NULLP239	
The number of houses should be lessened to reduce the impact on Silverdale	The site selection process has considered the number of homes proposed on the site and assessed the suitability of the proposed allocation	No change required	NULLP116 NULLP344	Dr Y Howells M A Nadin
This is as close as NUL gets to an accessible AONB and should be kept as a nature reserve.	Noted	No change required	NULLP164 NULLP1219 NULLP438	T Jervis T Fourier A Finch
Site not consistent with 2023 NPPF	The allocation of the site is consistent with the 2023 NPPF and its requirements	No change required	NULLP164	T Jervis
SP11 will be too overdeveloped to claim it functions as a country park, sites should be omitted to leave open green space	The site requirements include the production of a masterplan and design code for the site. This will influence the final number of homes provided for on the site.	No change required	NULLP164	T Jervis

The SP11 development doubles the Keele population	The site is considered suitable for allocation following the implementation of the site selection process	No change required	NULLP164	T Jervis
Scale back the development of some areas to be more sympathetic to the environment & community e.g. cancelling SP1&2, but continuing SP3&4 at a capped 300 dwelling limit.	The site, including all its parcels, is considered suitable for allocation following the implementation of the site selection process.	No change required	NULLP164	T Jervis
Further development of more land to the East of SP 23 - not sure why this is marked as protected as its just used for grassing. Also develop farm or scrub land that is not efficiently farmed or used as recreational areas.	For reasons of supporting the sites character determines that land to the east of SP23 is more suited for protected open space.	No change required	NULLP164	T Jervis
SP11 is rich in a variety of wildlife, trees and fauna and aids in natural carbon sequestration.	A large proportion of the site is allocated as a country park. The policy SA1 requires appropriate assessments of ecological impacts.	No change required	NULLP239 NULLP164 NULLP439	T Whally T Jervis S Axon
It is noted that significant levels of student accommodation are included within proposed housing land supply. This flaw has also been highlighted in those appeals, and also that Keele University has also made a public announcement of consolidation and	The site, at SP11, has been considered through the Council's site selection work and determined suitable for allocation to meet the identified housing	No change required	NULLP244	S and S Anthony

rationalisation due to major funding constraint. This also undermines the spatial and economic credentials of SP11	requirement in the Borough.			
Site specific flood risk assessment/Hydrology required	The Local Plan is supported by a level 1 strategic flood risk assessment. Site specific and detailed development management policies require the appropriate assessment of sites at the planning application stage.	No change required	NULLP672 NULLP465 NULLP1219 NULLP344	E Humphreys J Humphreys T Fourier M A Nadin
This Green Belt should never be developed, development will not enhance the area	The Council has assessed all available brownfield sites first and will only go into the Green Belt in exceptional circumstances as outlined in the NPPF. Further information on the site selection process is available in the Site Selection Report in the evidence base.	No change required	NULLP256 NULLP763	Dr J Albinson C Hoban
The research into housing need in the area is deeply flawed	This is considered in the response in the proforma for policy	No change required	NULLP1479 NULLP441 NULLP568	Save our Green Space T Billington N Billington

	PSD1 'overall development strategy'			
How can the plan deliver sufficient, affordable homes?	This site, alongside other relevant allocations in the Local Plan will provide for affordable homes, in line with the policy approach in the Local Plan	No change required	NULLP1479 NULLP441 NULLP568	Save our Green Space T Billington N Billington
Excessive house building, particularly the wrong houses built in the wrong place, has a detrimental effect on neighbourhoods and healthy communities.	The Local Plan has been produced in line with relevant evidence to support sustainable development in the Borough	No change required	NULLP1479 NULLP441 NULLP568	Save our Green Space T Billington N Billington
If the illustrated through road proposed would be open to all traffic, it is highly unlikely that the university would approve its development. The park as proposed would be compromised by the need to connect the SP11 and SP23 sites to the proposed community hub/school. We are also concerned that any such 'park' may be nothing more than a landbank for further housing development.	The policy context is set out for SP11 in the Local Plan.	No change required	NULLP1479 NULLP441 NULLP568	Save our Green Space T Billington N Billington
Would be interested to see if the mix of social and private development is considered.	The Local Plan includes policies on housing mix and type that would be	No change required	NULLP439	S Axon

	considered in a planning application.			
The former golf course should remain a greenbelt site and be converted into a country park, protected by law in perpetuity, giving borough residents easy access to a rewilded open space for recreational needs. The car park that currently remains locked should also be reopened providing adequate parking for visitors to the area.	Site SP11 proposes to take the larger allocation out of the Green Belt but provide for a country park, supported by four allocation parcels of land.	No change required	NULLP441 NULLP568	T Billington N Billington
The significant housing development in Keele and the surrounding areas, despite the proposed through road, will place significant pressure on existing infrastructure which is identified in SWECO's transport modelling.	The Strategic Transport Assessment [ED011] identifies the mitigation measures required to support the Local Plan proposals. This is reflected in the policy context for the relevant sites references KL13/KL15 and TB19. This need for a link road is also identified in the Infrastructure Delivery Plan	No change required	NULLP1018 NULLP386	Cllr D Jones Cllr J Brown
Concerns that the inclusion of parcels of land on the former Golf Course have been made based on pre-determination. Should cabinet wish to avoid concerns over pre-determination, they would need to	The site selection process and methodology are presented in the site selection report and appendices (ED029)	No change required	NULLP1018	Cllr D Jones

isolate themselves from the site selection process.				
The site provides the main green space between the villages of Keele and Silverdale, and critically contributes significantly to the biodiversity of the borough.	Noted	No change required	NULLP1018	CLlr D Jones
The Country Park aspect of the site should remain in Green Belt to protect it from future development.	Informed by the outcomes of the Green Belt assessment (part 4) [ED008], the entire SP11 site is proposed to be removed from the Green Belt with the policy requiring the introduction of a country park	No change required	NULLP1018	CLlr D Jones
The Racecourse would not be able to cope with the increased traffic from the development.	There are detailed requirements in the Local Plan including the need for transport assessments and other studies to consider specific impacts when sites are brought forward for development. The Local Plan is supported by a Strategic Transport Assessment [ED011] which has considered impacts of the Local	No change required	NULLP672 NULLP465 NULLP344 NULLP1119 NULLP1228	E Humphreys J Humphreys M A Nadin C Birchall J Matthews

	Plan allocations on the road network			
SP11(2) is located within areas of 'high' or 'very high' habitat distinctiveness and provide high biodiversity value.	There are policies in the Local Plan that require detailed assessment of the ecological value of sites. In addition, policy SP11 requires appropriate buffers to be provided to sites within the proposed allocation, for example criterion 7(b)	No change required	NULLP1323	Natural England
The country park should remain incorporated in the greenbelt and the boundaries should be regularised showing distinction between land uses.	Informed by the outcomes of the Green Belt assessment (part 4) [ED008], the entire SP11 site is proposed to be removed from the Green Belt with the policy requiring the introduction of a country park	No change required	NULLP1277	Silverdale Parish
Access to SP11(3) via Ashbourne Drive/Underwood Road and to SP11 (4) via Racecourse/Park Road should be pedestrian not vehicular.	Access to SP11(3) by vehicular traffic is considered to be suitable	No change required	NULLP1277	Silverdale Parish
Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.	The Strategic Transport Assessment [ED011] has considered the allocations and their	No change required	NULLP1277	Silverdale Parish

	impact on the road network.			
Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.	Noted. For the purposes of the Local Plan, Silverdale is considered part of Newcastle-under-Lyme, a strategic centre.	No change required	NULLP1277	Silverdale Parish
Given SP11 includes land in Keele Parish, which is rural, part of that site lies within a rural parish. The methodology adopted in the Rural Topic Paper (2024) does not address boundary issues where a housing allocation covers two adjoining parishes.	The Local Plan has published its methodology to defining settlements in the rural topic paper [ED005].	No change required	NULLP1277	Silverdale Parish
The proposals should make the trade-off explicit in terms of boundaries and density between new community provision and the housing allocation at SP11 sites 1,2,3 and 4	The boundaries of the site have been made clear on the policies map, as have the expected number of homes.	No change required	NULLP1277	Silverdale Parish
No guarantee has been given that the 30% affordable homes is being applied to each of the 4 developments within SP11.	It is expected that the provision of affordable homes will be in line with the policy requirements of the Local Plan.	No change required	NULLP344	M A Nadin
Conduct a traffic impact assessment/survey	Impacts on the highway network have been considered through the	No change required	NULLP344 NULLP805 NULLP972	M A Nadin S M Birchall Keele Parish Council

	Strategic Transport Assessment [ED011]			
The deed under which the land formerly Keele golf course was conveyed to the owner covenants that the conveyed land shall not be used for any other purpose than "... a golf course public open space or country park" "This would not include the use proposed in the Local Plan.	Noted. A large section of the site will be used as country park. The wider allocation is considered as being developable in the Council's housing land supply.	No change required	NULLP608	T Millington
This policy has been devised without any pre-consultation with key landowners whose support is necessary for delivery.	The Council has clearly stated its approach to and documented the implementation of the site selection process [ED029]	No change required	NULLP1240	G Willard
Increasing housing numbers on this site from 900 units will assist in meeting new national housing targets.	The density and capacity of the site is considered to be appropriately framed	No change required	NULLP1240	G Willard
Doubt over delivery of the park given that the Council has not set out how it will be delivered, its phasing, its future ownership, how it will be funded and who/ how it will be maintained.	The allocation includes, in policy, the requirement for a Country Park and its distribution is highlighted in Figure 3 of the Local Plan.	No change required	NULLP1240	G Willard
What are the plans for infrastructure other than the primary school?	The infrastructure delivery plan has been prepared to support the Local Plan. Health infrastructure is also a	No change required	NULLP479	L Dale

	requirement of the SP11 site.			
What reassurance can the Council give that the country park will be honoured?	The allocation includes, in policy, the requirement for a Country Park and its distribution is highlighted in Figure 3 of the Local Plan.	No change required	NULLP479	L Dale
The Final Draft Local Plan has responded to resident's views by splitting the land into smaller targets, maintaining housing targets but also allowing for a country park	Noted	No change required	NULLP379	R Adcock
Residents are sceptical about the delivery of a primary school and other infrastructure will materialise.	Those elements are identified as being required to support the Local Plan, through the Infrastructure Delivery Plan which has included engagement with Staffordshire County Council.	No change required	NULLP386	Cllr J Brown
Silverdale is not being afforded the same protection as Keele; the Green Belt is supposed to protect urban sprawl	The Council has undertaken a site selection process, informed by a Green Belt assessment and other relevant parts of the evidence base to determine an appropriate suite of	No change required	NULLP386	Cllr J Brown

	sites through the Local Plan			
No suitable access point from the Racecourse	It is considered that access is suitable (or can be made suitable) in the locations specified in the Policy for SP11.	No change required	NULLP805 NULLP831 NULLP832	S M Birchall D Leech E Leech
Additional concerns related to the possibility of rat runs through SP11 to and from Silverdale to the A525.	This is a matter of detail that can be addressed through the delivery of the site, through masterplanning and design coding of the site which can support traffic calming and other appropriate methods	No change required	NULLP406	H Adamczuk
The impression given in the documentation is that issues in the design of SP11 are more important than SP23 to solve. This is a mistake that should be addressed.	SP23, criteria 7 requires masterplanning to consider appropriate linkages to SP11 (4) Park Road.	No change required	NULLP406	H Adamczuk
Sceptical regarding delivery and finding developers given the financial contributions, risk assessments and Walley's Quarry.	The site is included as part of the developable supply of sites across the Plan period.	No change required	NULLP972	Keele Parish Council
It is unclear which Urban or Rural Centre will service the proposed housing, especially SP11(1) and (2)	Matters of density and design would be established through the design code / masterplanning work for the site	No change required	NULLP972	Keele Parish Council

No details regarding linking the developments together.	The Policy requires the preparation of a design code for the wider allocation.	No change required	NULLP972	Keele Parish Council
Welcome the inclusion of a local centre but there is no clarification of what this entails and where the location of this will be	The location of the local centre is anticipated within parcel SP11(1) and is designed to meet local retail convenience needs.	No change required	NULLP972	Keele Parish Council
SP11(4)- the land slopes sharply and floods Park Road.	Criteria 8 of the policy for SP11 requires a sequential approach to flood risk on site.	No change required	NULLP228	J Matthews
The Golf Course is waterlogged and will cause village flooding. Parking is an issue in the village	Criteria 8 of the policy for SP11 requires a sequential approach to flood risk on site. A large proportion of the site will be retained as a country park.	No change required	NULLP831 NULLP832	D Leech E Leech
The assessment that has led to the allocation is contrived, lacks transparency, and has no justification; the Council should look to allocate KL21	The site selection report sets out the approach to proposed allocation of sites in the Local Plan	No change required	NULLP1058	Persimmon Homes
The Policy restricts occupation of dwellings to the date at which import of non-hazardous waste to Walleys Quarry landfill ceases. Whereas the text in paragraph 13.177 states 'No	Noted	The text is proposed to be modified to be consistent with the policy text in relation to the operations of Walleys Quarry.	NULLP1106	Staffordshire County Council

<p>dwelling on parcel 4 on Park Road should be occupied until the operation of Walleys Quarry as a landfill site has ceased which is anticipated in 2027'. As set out in our comments on the Policy the end date for operations as a landfill is 2042.</p>				
<p>Walleys Quarry landfill site is an operational site which has permission for landfilling until 2042. It is likely that operations will continue at the site throughout the duration of the Local Plan.</p>	Noted	No change required	NULLP1089	Staffordshire County Council
<p>Policy SP11 on SP11 (4) has an incorrect spelling, "...no dwellings will be occupied before the cessation of the disposal of non-hazardous waste at the Walley's Quarry Landfill site," this should be changed to the correct spelling for Walleys Quarry Landfill Site.</p>	Noted	The spelling in Policy SP11 has been updated in the main modification schedule.	NULLP1089	Staffordshire County Council
<p>ED011 Strategic Transport Assessment provides the evidence base for making this allocation. The report indicates there is an unacceptable residual traffic impact on A525 Keele Road.</p>	Noted, thus the policy requires contributions towards highway improvements, including to facilitate the distribution of traffic from the A525 to	No change required	NULLP1084	Staffordshire County Council

	Whitmore Road (criteria 16).			
The HIA identifies a medium level of harm but no avoidance or mitigation measures in order to prevent this harm.	Clause 3 requires the site promoters to prepare a heritage impact assessment on the site, with appropriate reference to the work undertaken by the Council. There are a number of other mitigation measures which reflect the recommendations of the Council's Heritage Impact Assessment including criterion 14 and the provision of a landscape buffer and criterion 4 in relation to a programme of archaeological recording on the site	No change required	NULLP542	Historic England

109. Policy SP22 Former Playground off Ash Grove

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Not enough detail regarding the impact of the development on Silverdale Conservation Area, St Lukes Church and Keele Registered Park and Garden, and how any harm can be overcome.	The Council's Heritage Impact Assessment has considered impacts on the Conservation Area and includes mitigation in criteria 4,5 and 8. The assessment notes that the edge of the registered Park & Garden of Keele Hall lies just within the study area, nearly 1km to the south, but there is no intervisibility between this and the site.	No change required	NULLP543	Historic England
It is anticipated that a planning application for this site would be submitted during the first quarter of 2024.	Noted	No change required	NULLP901	Knights (on behalf of Aspire Housing)
The infrastructure in Silverdale cannot cope with additional development	The Local Plan allocations is supported by an infrastructure delivery plan which has identified the infrastructure required to support the site. The site policy requires contributions to improvements in the	No change required.	NULLP19	CT Lomax

	capacity of local schools and health facilities.			
The high school and doctors are unable to cope with more people moving to the area	As above	No change required	NULLP322	L Rowley

110. Policy SP23 Land at Cemetery Road / Park Road

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Supportive of proposal	Noted	No change required	NULLP723	Knights on behalf of Richborough Estates
Illustrative Concept Plan and Delivery Strategy submitted for site SP23 from site promoters	Noted	No change required	NULLP723	Knights on behalf of Richborough Estates
The infrastructure in Silverdale cannot cope with additional development.	The infrastructure delivery plan has considered the infrastructure requirements needed to support allocations in the Local Plan.	No change required	NULLP22	C T Lomax
The additional traffic from the development will have a major impact on road congestion	The impacts on the highway network have been considered through the strategic transport assessment [ED011] which has identified mitigation measures which have been secured through planning policy wording	No change required	NULLP65 NULLP1482	E Phoenix Save Our Green Space
Disrupting wildlife including kestrels and bats	Policy SA1 includes requirements for ecological assessments on the site	No change required	NULLP65	E Phoenix
Without very expensive field drains, which will push the cost of the proposed houses way up, the hapless inhabitants will live inside a	Criteria 13 requires a sequential approach to direct development to areas at lowest risk of flooding	No change required	NULLP257	Dr A Albinson

series of swamplets. There is a risk of mudslides also				
The high school and doctors are unable to cope with more people moving to the area	The infrastructure delivery plan has considered the infrastructure requirements needed to support allocations in the Local Plan. The policy requirements for policy SP23 requires contributions to improvements in the capacity of local schools and health facilities.	No change required	NULLP322	L Rowley
Taking away a large area of open space, that should be preserved	The site has been considered through the site selection report [ED029] and is considered suitable for allocation	No change required	NULLP1482 NULLP442	Save Our Green Space T Billington
The research into housing need in the area is deeply flawed	This is considered through policy PSD1 Overall Development Strategy	No change required	NULLP1482 NULLP442	Save Our Green Space T Billington
How can the plan deliver sufficient, affordable homes?	The site allocation is expected to deliver affordable homes in line with the policy requirements of the Local Plan (in policy HOU1)	No change required	NULLP1482 NULLP442	Save our Green Space T Billington
If the intention is that Keele will be one of these centres, we would point out that the retail facilities available are very limited but not as	Part of the SP11 site (parcel 1) in policy, is intended to provide for a local retail facility.	No change required	NULLP1482 NULLP442	Save our Green Space T Billington

limited as the available parking. The failure of the plan to dignify Silverdale as a centre of any sort, rather including it within urban Newcastle, prevents any recognition of the extra footfall Silverdale might receive				
The park as proposed would be compromised by the need to connect the SP11 and SP23 sites to the proposed community hub/school. We are also concerned that any such 'park' may be nothing more than a landbank for further housing development.	The policy intends for protected open space to the east of the site.	No change required	NULLP1482 NULLP442	Save our Green Space T Billington
Would be interested to see if the mix of social and private development is considered.	There are policy requirements on housing mix, tenure and type in the Local Plan which will influence the development achieved on the site.	No change required	NULLP439	S Axon
The significant housing development in Keele and the surrounding areas, despite the proposed through road, will place significant pressure on existing infrastructure which is identified in SWECO's transport modelling.	The Strategic Transport Assessment [ED011] identifies mitigation measures required to support the Local Plan proposals. For site SP23, contributions are sought for highway improvements to facilitate the distribution of traffic from the A525 to Whitmore Road,	No change required	NULLP1019	Cllr D Jones

SP23 is located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value	There are policies in the Local Plan that require detailed assessment of the ecological value of sites.	No change required	NULLP1324	Natural England
BDP Lyme Park document, uploaded to the planning portal on 27 August indicated the rationale for SP11 yet the proposal for infrastructure did not address SP23 as clearly as SP11	Noted, the policy context for site SP23 is included in the Local Plan	No change required	NULLP1278	Silverdale Parish Council
Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.	The strategic transport assessment considered all proposed allocations in the Local Plan, including SP11 and SP23	No change required	NULLP1278 NULLP345 NULLP806	Silverdale Parish Council M A Adin S M Birchall
Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.	For the purposes of the Local Plan, Silverdale is considered part of the strategic centre of Newcastle-under-Lyme	No change required	NULLP1278	Silverdale Parish Council
Maintain the area as Greenbelt & find an alternative site for the housing development.	The exceptional circumstances for Green Belt release are included in the Plan Strategy Topic Paper (Housing) [ED031]	No change required	NULLP345	M A Adin
Conduct an in-depth Hydrology impact assessment that includes the Topography.	The Plan is supported by appropriate evidence. Detailed policies included in the Local Plan on flooding and drainage would also be relevant at	No change required	NULLP345	M A Adin

	the planning application stage			
Conduct a health risk assessment on human health hazards associated from the continuous workings of Walley's quarry up to 2042 & beyond.	For SP23, the policy seeks to restrict occupation of dwellings until the cessation of the disposal of non-hazardous waste at Walleys Quarry.	No change required	NULLP345	M A Adin
What are the plans for infrastructure other than the primary school?	Site SP23 is expected to provide contributions towards improvements to the capacity of local schools / health facilities, and highway improvements	No change required	NULLP1105	L Dale
All access points should be situated on the Keele main road, avoiding the village.	The strategic transport assessment has considered the access routes identified in the Local Plan.	No change required	NULLP1105	L Dale
No suitable access point from the Racecourse	SP23 requires appropriate access from Cemetery Road	No change required	NULLP806	S M Birchall
Racecourse is the main access point to SP 11(4). But SP23 adjoins the site. So, what is the relationship between SP11(4) and SP23? The Local Plan Policy SP23 states it is Cemetery Road. There is no drawing of an access road to SP23 that informs the way movement occurs.	As noted in paragraph 13.183, primary site access is expected to the site from Cemetery Road. A further access point will also be achieved through linkages to the adjacent SP11(4) site.	No change required	NULLP401	H Adamczuk
Pedestrian access through Ashbourne Drive and Racecourse would both minimises the traffic	Noted	No change required	NULLP401	H Adamczuk

disruption in Silverdale and alleviate road safety concerns.				
SP23 and SP11(4) are effectively a single site, how will the field visible from Gallowstree roundabout be protected from future development?	An area to the east of SP23 is identified through the Local Plan as protected open space	No change required	NULLP973	Keele Parish Council
The land slopes sharply and floods Park Road.	The site, in criterion 13, requires a sequential approach within the site to direct development to areas of lowest risk of flooding. The plan is also supported by a few relevant policies in relation to flooding and drainage.	No change required	NULLP1232	J Matthews
Concerns regarding proximity to Walley's Quarry, and modify plan to remove site allocation	This is considered as part of a developing statement of common ground with the Environment Agency	No change required	NULLP1359	Environment Agency
The Policy restricts occupation of dwellings to the date at which import of non-hazardous waste to Walleys Quarry landfill ceases. Whereas the text in paragraph 13.177 states 'No dwellings on parcel 4 on Park Road should be occupied until the operation of Walleys Quarry as a landfill site has ceased which is anticipated in 2027'.	Noted	A change is proposed to be made to reflect the comment raised by Staffordshire County Council	NULLP1104	Staffordshire County Council

As set out in our comments on the Policy the end date for operations as a landfill is 2042.				
Walleys Quarry landfill site is an operational site which has permission for landfilling until 2042. It is likely that operations will continue at the site throughout the duration of the Local Plan.	Noted	The policy criteria relate to the ceasing of the importation of non-hazardous waste to Walleys Quarry landfill.	NULLP1090	Staffordshire County Council
Consider that the cumulative impacts require further assessment and an understanding if all development proposals can come forward.	The Heritage Impact Assessment prepared for the site identifies a low heritage sensitivity score for the proposal. The site includes several listed mitigations including the retention of trees and hedgerows and a landscape buffer in recognition of mitigation measures identified through the heritage impact assessment	No change required	NULLP546	Historic England

111. Site G&T 8 Land West of Silverdale Business Park

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
There are no services to this site other than via Cemetery Road or Park Road.	The site is located in an urban location with access to town centre facilities in reasonable proximity to the site.	No change required	NULLP6	A Barber
Access to the site will increase traffic in Silverdale, The Racecourse and Silverdale Primary School, which created potential danger	The site requires an appropriate visibility splay and access arrangements from Park Road	No change required	NULLP117 NULLP807 NULLP347	Dr Y Howells SM Birchall MA Nadin
Site is in the Greenbelt	The site is not in the Green Belt	No change required	NULLP117	Dr Y Howells
Concerned about the drainage and sewage removal which will overload the already struggling old pipe work of the village of Silverdale.	Paragraph 13.193 notes that there is expectation that the requirements of policy HOU4 are addressed. The requirements of Policy HOU4 2(F), provide for a level of essential services and facilities on the site.	No change required	NULLP117	Dr Y Howells
The proposed access from Park Lane is a path / unsurfaced road through the allotments and is not wide enough, is in poor condition and is also a public footpath. Not suitable for vehicles	The site requires an appropriate visibility splay and access arrangements from Park Road	No change required	NULLP88 NULLP86	J Odams C Mrozicki
Access would require the existing gates to the allotment site to be left	Criteria 6 requires the provision of appropriate	No change required	NULLP88 NULLP569	J Odams J Simpson

open, making the site insecure and the car park open to unauthorised camping, fly tipping etc.	access arrangements into the site			
As the access cuts across the allotment site how will the allotment safety be maintained/ will there be any security measures?	The site requirements alongside policy HOU 4 provide for the appropriate boundary treatments on the site. Criteria 6 requires the provision of appropriate access arrangements into the site.	No change required	NULLP86 NULLP264 NULLP569	C Mrozicki B Alcock J Simpson
There is no lighting on this access therefore especially in the winter months the proposed access will be in total darkness how will this be addressed?	The site requirements alongside policy HOU 4 provide for the appropriate boundary treatments on the site. HOU4(2, d) requires the provision of a safe environment for intended occupants including appropriate design and lighting	No change required	NULLP86	C Mrozicki
The proposed site currently sits as part of a statutory registered allotment site, not currently in use due to Council neglect	The Gypsy and Traveller Site Selection Report [ED019] has considered the limited site options	No change required	NULLP86 NULLP1279 NULLP569	C Mrozicki H Adamczuk (Silverdale Parish Council) MA Nadin
What would happen if all of these pitches are occupied and more arrive?	The site is a permanent site and not a transit site	No change required	NULLP264	B Alcock
What would happen to the Public Right of Way Footpath No 22?	This is a matter that would be considered	No change required	NULLP264	B Alcock

	during a planning application			
The development of this site would be unsustainable and environmentally harmful in another context. Northwest of the proposed access road is the Racecourse Community Woodland, between Mill Street 1312 and Park Street, containing many mature native trees and there are local springs which generate an ecology that would be harmed by the traffic and development proposed.	The site has been considered through the Gypsy and Traveller site selection report [ED019] and is considered suitable for allocation.	No change required	NULLP352	H Adamczuk
I feel the high school and doctors will not be able cope with new people coming to area.	The Plan is supported by an infrastructure delivery plan which has identified where contributions / direct provision of infrastructure is required through policy. In this instance, no infrastructure requirements have been identified as being necessary.	No change required	NULLP324	L Rowley
Although 5 pitches are planned, the size of the site is such that more could be allocated in the future.	The site is allocated for 5 pitches in the policy for G&T8.	No change required	NULLP347	MA Nadin
Walleys Quarry landfill site is an operational site which has permission for landfilling until 2042. It is likely that operations will	Noted	A change to paragraph 13.192 is proposed to reflect the position re Walleys Quarry.	NULLP1088	Staffordshire County Council

continue at the site throughout the duration of the Local Plan. The landfill gas utilisation plant, leachate control and monitoring equipment, and the groundwater monitoring equipment would be required during the restoration and aftercare phase. Non-reactive hazardous waste is allowed until the end of 2026.				
There is no suitable access for any of these developments from Racecourse.	Access into the site is considered to be able to be made suitable as required through policy criterion 6.	No change required	NULLP807	SM Birchall
This site was a late inclusion into the Scrutiny Committee without proper consultation.	There has been opportunity through consultation on the Regulation 19 Plan for stakeholders to make their views known on the suitability of the site	No change required	NULLP1279	H Adamczuk (Silverdale Parish Council)
The decision is challengeable in the law because the land was acquired for the specific purpose of being kept as allotments. Acre Allotments was recorded in the 1900 OS Map and in previous years, having been previously designated so for the use of Silverdale's citizens.	The site has been considered through the Gypsy and Traveller site selection report [ED019] and is considered suitable for allocation.	No change required	NULLP1279	H Adamczuk (Silverdale Parish Council)
The site is contaminated from a large quantity of white asbestos (Chrysotile Asbestos) and illegally disposed vehicle oil. How will			NULLP1504 NULLP6 NULLP88 NULLP86	D Huckfield A Barber J Odams C Mrozicki

this be safely removed give the public footpath issues mentioned in earlier concerns			NULLP264	B Alcock
The land sits on natural springs and tends to become waterlogged/ floor risk	Criteria 4 of the policy requires the use of permeable materials as replacement hardstanding, alongside a drainage strategy.	No change required	NULLP1504 NULLP86	D Huckfield C Mrozicki
Site would require the rerouting of a public footpath	This matter would be considered at the planning application stage	No change required	NULLP1504	D Huckfield
Cost of developing a proposal would be expensive	The site has been considered through the Gypsy and Traveller site selection report [ED019] and is considered suitable for allocation.	No change required	NULLP6 NULLP1504	A Barber D Huckfield
A new road would require to be constructed	The policy (criteria 6) requires appropriate visibility splay and access arrangements from Park Road	No change required	NULLP1504	D Huckfield
Alternative proposal – to allocate site next to site on Cemetery Lane	The site selection report [ED019, pg7] notes how the Cemetery Road site has been discounted through the site selection process.	No change required	NULLP1504	D Huckfield

112. Talke and Butt Lane

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
How will the sewage plant on Liverpool Road, Kidsgrove cope with the additional demand from the houses proposed in the Local Plan for Talke and Kidsgrove.	The Local Plan is supported by a water cycle study (2024, ED014) which has considered the infrastructure requirements of the Local Plan.	No change required	NULLP1294	Talke Action Group
Number of dwellings proposed for the TK sites is disproportionate for this semi-rural village.	Sites have been considered as suitable for allocation through the site selection report [ED029]	No change required	NULLP1294	Talke Action Group
Impacts on local infrastructure including health have not been considered through the allocation of sites. Education is another concern.	The Local Plan has been supported by an infrastructure delivery plan which has identified requirements for health and education infrastructure required alongside the Plan.	No change required	NULLP1294	Talke Action Group
Highway impacts have not been sufficiently considered through the allocation of sites.	The Strategic Transport Assessment [ED011] has considered the impacts of allocations on the road network and identified appropriate mitigation measures.	No change required	NULLP1294	Talke Action Group

The TK sites are not viable due to infrastructure and other constraints and therefore not effective	It is considered that the TK sites are viable and suitable for allocation in the Local Plan.	No change required	NULLP1294	Talke Action Group
The allocation of the sites would contravene a number of strategic objectives, including those set out in the Sustainability Appraisal	The suitability of sites for allocation have been considered through the site selection process [ED029].	No change required	NULLP1294	Talke Action Group
The housing number should take account of recent planning permissions in the local area	The site selection report [ED029], takes account of commitments and completions at a point in time.	No change required	NULLP1294	Talke Action Group
We would also recommend following explanatory text: 'Applicants must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals	Noted, it is considered that the existing wording is sufficient to draw attention of the decision taker to the matters highlighted here by United Utilities	No change required	NULLP1048	United Utilities

<p>could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'</p>				
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113. Policy BL8 Land adjacent to roundabout at West Avenue, Kidsgrove

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The site is considered to have traffic issues & infrastructure challenges which brings into question the viability & deliverability of the proposals.	Noted. Evidence base documents ED011 Strategic Transport Assessment; Infrastructure Delivery Plan; & ED004 Viability Assessment considers in depth these respective issues. The Strategic Housing and Employment Land Availability Assessment (ED006a) evaluates the deliverability of individual sites, when taking account of numerous factors.	No change required	NULLP195	D Grocott
Timings of release of Local Plan documents has not allowed proper scrutiny and meaningful consultation for both residents & councillors.	At the time of making the decision on the 24 July 2024, all evidence base documents were available to decide on the Local Plan. A motion on the matter raised was raised and considered at Full Council.	No change required	NULLP195	D Grocott

114. Policy BL18 Land at Clough Hall

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Concerned about impacts on the site on wildlife, ecology, and protected species	The site requirements include an appropriate ecological buffer. In addition, relevant habitats and species surveys would be required on any site proposal, in accordance with Policy SE8	No change required.	NULLP63 NULLP80 NULLP77	C Bevington J Johnson E Knox
Concerned regarding the loss of green open spaces / open countryside impacts	In line with the site selection approach, reasonable endeavours had been made to identify brownfield sites for allocation. It has been necessary to consider allocations in the open countryside / Green Belt in order to meet the identified development requirements in the Plan.	No change required.	NULLP80 NULLP77	J Johnson E Knox
There is a natural spring which runs through the site and floods a lot of the land over the winter months.	The site requirements (criterion 4) require a sequential approach to be undertaken to direct development away from areas of high flood risk	No change required.	NULLP80	J Johnson

Installing another set of lights, or a roundabout would only add to the congestion especially when the M6 is closed or gridlocked.	The Council's Strategic Transport Assessment [ED011] has considered the transport implications of the Local Plan and proposed improvements to Talke Signals to support the delivery of the sites in the Plan.	No change required	NULLP80	J Johnson
The allocation is unsound as currently drafted with no replacement provision proposed in line with SE6 and it not being demonstrated that the site is surplus to requirement. The site has historically been marked out for playing pitches and the PPS also identifies that within Kidsgrove analysis area, where the site is located within, there are current shortfalls in football and cricket, which are exacerbated when taking account of future demand.	Site criterion 8 requires the retention of playing pitches, with ancillary facilities for employment use	No change required	NULLP220	Sport England
The land has and should remain a Green Area and Playing fields for the local community, it has always been used as such for as long as I can remember. While we are pleased to hear the retention of the two pitches there are still many problems with regard to the infrastructure, amenities, and access to this site. (Raised concerns	The exceptional circumstances are set out in the Plan Strategy Housing Topic Paper [ED031]	No change required	NULLP253 NULLP254	Mrs D Shaw P Shaw

with access, drainage, facilities, and schools)				
<p>My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft Local Plan. And any new developments in rural areas will, at the very least, result in:</p> <p>Loss of light or overshadowing Increased risk of flooding due to 'run-off' Loss of visual amenity Limitations to physical activity Generation of extra traffic, overloading already busy local roads Extra noise, pollution, disturbance, and danger from increased traffic Loss of trees and other biodiversity – bats, lizards etc. Loss of natural carbon capture Decrease in food production capacity. Increased local population placing further pressure on local schools, GP's surgeries, and other services, which are already oversubscribed.</p>	<p>The site allocations are supported by an infrastructure delivery plan which has identified those mitigation measures required to support the site, in infrastructure terms. This has identified the need for financial contributions to improvements in the capacity of local schools and health facilities. There are criteria in the policy in relation to the need for a noise assessment and land contamination assessment to support the delivery of the site. There are also criteria in the policy regarding directing development to lowest sources of surface water flood risk.</p>	No change required	<p>NULLP306 NULLP305</p>	Dr J Austin
<p>All of these developments impact Green Belt land, are unsound and should be removed from the plan. They will all have a negative effect on the Net Biodiversity gain of each local area.</p>	<p>The exceptional circumstances are set out in the Plan Strategy Housing Topic Paper [ED031]</p>	No change required	NULLP768	Mrs C Hoban

	Biodiversity Net Gain improvements are required as part of the Plan.			
<p>We request that the following criterion is added to this policy: 'Development layout will consider proximity to the sewers within and adjacent to the site and provide for access for maintenance, repair and replacement, and appropriate offset distances from the assets.'</p> <p>We request that criterion 4 is amended as follows: '4. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding and sewer flooding,'</p> <p>We also recommend the following amendments to paragraph 13.205 and 13.206. '13.205 Parts of the site are affected by surface water flooding. A sequential approach will be taken within the site to direct development to areas of lowest flood risk.</p>	Noted	Several modifications are proposed to reflect on the comments provided by United Utilities on this issue.	NULLP1046	United Utilities
<ul style="list-style-type: none"> - Impact on wildlife, this land is home to at least eight protected species some of which also have their habitat protected. - This land is home to several 	The site requires an appropriate ecological buffer to Bathpool park. Policy SA1 requires a number of ecological requirements including relevant surveys.	No change required	NULLP674	D Palmer

<p>protected trees and is also known to have issues with Japanese knotweed which would require extensive work to be undertaken in order to eradicate it before building were to commence.</p> <ul style="list-style-type: none"> - It is home to several freshwater springs and as a result becomes extremely waterlogged. - Privacy issues already exist for residents of Beech Drive - impact of the additional traffic - increases in crime - impact schools, nurseries doctors, dentists, Ambulance Service, and Fire Service. - take away the only local facility where dog owners could exercise their dogs without having to keep them on a lead, - far better site would be where the Arnold Clarke storage facility is, situated adjacent to the A34 	<p>Traffic impacts on the local road network have been considered through the Strategic Transport Assessment.</p> <p>Infrastructure requirements have been considered in the Infrastructure Delivery Plan.</p>			
<p>It is necessary to comment further on the paragraphs concerning the risks of surface water flooding and site drainage. Paragraph 13.206 specifically calls for 'an effective drainage strategy' which is of ongoing associated concern with regards to Clough Hall Lake which has been neglected for many, many years by the Borough Council.</p>	<p>Noted</p>	<p>No change required</p>	<p>NULLP821</p>	<p>K Salt</p>

I have seen abundant flora and fauna, many of whom are rare species, which I have been documenting as I fear so much for the future of this habitat oasis. I am happy to provide a list and photos of these. There are native wild orchids, birds, invertebrates, wildlife, and fungi who share this habitat with us, and call it their home. The younger oak trees on the field were I believe planted by schoolchildren as a part of a project to help renature the area and they are absolutely thriving and happy, they have been an absolute joy to watch grow and mature over the years and it sickens me to the core to think they are under threat of being bulldozed to create housing on what is clearly highly unsuitable land.	The site requirements include an appropriate ecological buffer. In addition, relevant habitats and species surveys would be required on any site proposal, in accordance with Policy SE8	Noted	NULLP1257	R Wells
I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable	The infrastructure delivery plan has considered the impact on the allocation on local infrastructure and has included, in policy, relevant wording to seek contributions where necessary.	No change required	NULLP1196	Cllr D Grocott
Natural England would like to further understand this larger residential development proposal	Noted	No change required	NULLP1319	Natural England

with regards to the potential impacts on the lowland fen habitat.				
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115. Policy BL32 Land at Congleton Road

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Expresses the need for a Local Plan but raises concerns about several proposed sites (including BL32) due to infrastructure issues and unsubstantiated assumptions. Highlights traffic concerns for all listed sites and notes recommendations regarding the A500, Talke Interchange, and A34/A527, which will require significant financial assistance. Questions infrastructure viability and deliverability for all sites. Specifically mentions AB2 (80-hectare warehousing/factory proposal) and CT1 (Red Street development) and expresses reservations about their size and potential impact, suggesting alternative options may exist. Raises concerns about documentation availability, infrastructure, and financial viability.	The Council acknowledges Mr. Grocott's representation regarding the Local Plan and the proposed site allocations, including BL32 (Land at Congleton Road, Butt Lane). The Council understands the concerns raised about infrastructure capacity and the deliverability of various development proposals. The Council confirms that the site allocations included in the Local Plan, including BL32, have been identified through a robust, evidence-based process which considers a wide range of factors including transport and accessibility, environmental constraints, and infrastructure capacity, as set out in the supporting text for Policy BL32 and associated evidence base documents. The Council has considered the sites identified by Mr Grocott, including AB2, AB33, AB12, AB15, CT1, BL8, BL18, BL32, TK6, TK17 and TK27, and their associated traffic impacts, and confirms that the details of its assessment are set out in the relevant site allocation policies and supporting documents. These documents include detailed assessments such as the Transport Assessment and Infrastructure Delivery Plan, which demonstrate the Council's commitment to planning for sustainable development and ensuring that necessary infrastructure is delivered to support growth. Whilst the Council notes Mr Grocott's specific concerns regarding sites AB2 and CT1, the	No change required	NULLP1199	D Grocott

	details of its assessment of these sites are documented in the associated evidence base, and their allocation is appropriate. For further detailed information on the site selection process and the Council's assessment of these, and other site allocations, please refer to Chapter 14 (Site Allocations), supporting text and associated evidence base documents.			
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116. Policy TK6 Site at Coalpit Hill

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Objects to the TK6 allocation as unsound due to lack of replacement provision and the site not being demonstrated as surplus to requirements. Notes the site's historical use for playing pitches, current shortfalls in football/cricket provision in the Kidsgrove area (exacerbated by increased demand), and the Infrastructure Development Plan's identification of a need for additional pitch provision. Recommends adding a criterion to Policy TK6 requiring replacement provision in line with Policy SE6, ensuring compliance with NPPF paragraph 103.	The Council acknowledges Sport England's objection to TK6 and understands the concerns raised regarding the loss of playing fields and the lack of replacement provision. The Council confirms that the site's existing and historic use for sports and leisure has been considered alongside all other material considerations, including the need for new housing in this location, as part of a comprehensive site assessment process as set out in TK6 and the associated documentation and evidence base. The Council maintains that the allocation of TK6 for residential development is appropriate and justified, contributing to the Borough's housing needs, and any future requirements for playing pitch provision will be addressed through the updated Playing Pitch Strategy (PPS) as identified in Policy SE6: Open Space, Sports, and Leisure Provision. The Council is committed to working with Sport England and other relevant stakeholders to ensure that the PPS is robust, up-to-date, and effectively addresses the Borough's playing pitch needs.	No change required	NULLP213	Sport England
Notes that Clause 3 of Policy TK6 is generic and lacks specific mitigation measures to overcome potential harm.	The Council acknowledges Historic England's comment regarding the generic nature of Clause 3 in TK6. The Council maintains that this clause, which requires consideration of heritage assets and their setting in accordance with Policy SE9 (Historic Environment), provides a sufficiently robust framework for assessing potential harm to	No change required	NULLP547	Historic England

	heritage assets. Specific mitigation measures, where necessary, will be considered during the detailed design stage of any development proposal for the site and will be subject to further scrutiny as part of the application process.			
This comment, like NULLP1199, expresses a general need for a Local Plan but raises concerns about the overall soundness and infrastructure capacity related to several sites, including TK6. Specifically mentions AB2 and CT1 due to concerns over their size and suitability, suggesting alternative options may exist. Raises broader concerns about documentation availability and the consultation process.	This comment raises similar concerns to NULLP1199, and broader planning matters such as documentation availability, infrastructure capacity, and financial viability. As such, the Council's response is the same as for NULLP1199 (see above), directing the commenter to the relevant policy sections and supporting documents for more information. Further details of the site allocations process can be found in Chapter 14 (Site Allocations), the supporting text, and the associated evidence base documents.	No change required	NULLP1200	D Grocott
This is a lengthy, detailed representation submitted on behalf of the Talke Action Group (TAG) and 172 signatories. It raises concerns about the Local Plan's legal/procedural compliance and soundness. Specific issues raised relating to TK6 (and other TK sites) include disproportionate housing allocation to the village, lack of infrastructure capacity (roads, healthcare, schools), lack of meaningful community engagement during the consultation process, lack of transparency in site selection, limited document availability for councillors, and conflict with Sustainability Appraisal objectives and transport policies. The TAG suggests modifying the plan to remove some or all of the Talke sites, explore alternative sites (including brownfield), and implement measures to mitigate the impact of development on local infrastructure.	The Council acknowledges Talke Action Group's (TAG) representation regarding the Local Plan and the proposed site allocations in Talke, including TK6. The Council understands the concerns raised, which include the disproportionate allocation of housing, the potential strain on local infrastructure, and the perceived lack of community engagement during the consultation process. The Council confirms that the site selection process, as set out in the supporting text and evidence base for Policy PSD3 (Distribution of Development), involved a thorough assessment of all potential sites, considering a range of factors including housing need, sustainability, environmental constraints, infrastructure capacity, and community impact, and the sites identified in Chapter 14 of the Local Plan and other supporting evidence demonstrates a balanced and considered approach to meeting the boroughs	No change required	NULLP1296	Talke Action Group

	housing requirements. The specific concerns raised regarding the TK sites has been given due consideration and it is demonstrated, through the evidence base, how the Local Plan addresses these concerns. The Council values input from all stakeholders, including residents' groups such as TAG, and appreciates the detailed feedback provided. The Council maintains that the Local Plan is compliant with all necessary legal and procedural requirements and that the proposed site allocations, including TK6, are justified and contribute towards a sustainable development strategy for the borough.			
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117. Policy TK10 Land at Crown Bank

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane	The policy requires access to the development being via Pit Lane. The Local Plan is supported by Strategic Transport Assessment [ED011] which has considered the impacts of the proposed allocated sites on the road network. Criteria 13 requires contributions to improvements to Talke Signals, which has been identified as necessary through the Strategic Transport Assessment	No change required	NULLP1294 NULLP1297	Talke Action Group
This is a sustainable and accessible site, with excellent access to bus services which in turn provide good access to the centres of Hanley, Newcastle-under-Lyme and elsewhere. The site lends itself to an extension to the built-up area of Talke, providing an opportunity to deliver a reasonable number of family and affordable key worker homes to support the sustainability and development of the area. This site is a logical location to accommodate growth in this part of	Noted	No change required	NULLP925	Dr D Hodgkinson

Newcastle-under-Lyme to align with this strategy. It is considered that development on this site would not contradict any of the five purposes of including land within the Green Belt and would provide a logical location to provide housing on the edge of the Urban Area.				
<p>Additional detail should be incorporated within this clause to set out the specific mitigation measures required. (TK10 Clause 6)</p> <p>Additional detail should be included about what type of archaeological assessment and issues need to be considered. (TK10 Clause 7)</p> <p>Paragraph 13.222</p> <p>This paragraph discusses the need for design to respond positively to the nearby heritage assets but what harm was identified through the HIA and how can this be overcome by site specific requirements.</p>	The Policy as drafted, is considered to be consistent with the mitigation measures identified in the Heritage Impact Assessment. Indeed, the policy requires a site-specific Heritage Impact Assessment that considers how the site responds sensitively to the Talke Conservation Area and associated heritage assets.	No change required	<p>NULLP548</p> <p>NULLP549</p> <p>NULLP562</p> <p>NULLP563</p>	Historic England
My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft Local Plan. And any new developments in rural areas will, at the very least, result	The site allocations are supported by an infrastructure delivery plan which has identified those mitigation measures required to support the site, in infrastructure terms. This has identified the need for financial contributions to	No change required	NULLP317	Dr J Austin

<p>in:</p> <ul style="list-style-type: none"> · Loss of light or overshadowing · Increased risk of flooding due to 'run-off' · Loss of visual amenity · Limitations to physical activity · Generation of extra traffic, overloading already busy local roads · Extra noise, pollution, disturbance and danger from increased traffic · Loss of trees and other biodiversity – bats, lizards etc. · Loss of natural carbon capture · Decrease in food production capacity · Increased local population placing further pressure on local schools, GP's surgeries and other services, which are already oversubscribed. 	<p>improvements in the capacity of local schools and health facilities.</p> <p>There are criteria in the policy in relation to the need for a noise assessment and land contamination assessment to support the delivery of the site.</p> <p>There are also criteria in the policy regarding directing development to lowest sources of surface water flood risk.</p>			
<p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical</p>	<p>The Local Plan includes criteria for a 10% improvement in biodiversity net gain.</p> <p>The policy criteria for the site requires the provision of a noise assessment. The site is considered suitable for allocation following the implementation of a site selection process documented in evidence document [ED029]</p>	No change required	NULLP765	Mrs C Hoban

activity which improve both physical and mental health. Removal of Green Belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.				
We wish to note that this site is the location for a large, pressurised sewer and a sewer identified as no longer in use. Access to the sewer must be maintained and the layout must provide appropriate stand-off distances away from the assets. The status of the sewer identified as no longer in use should be confirmed.	Noted	Additional text is proposed to be added to paragraph 13.222 to note the point being raised.	NULLP1047	United Utilities

118. Policy TK17 Land off St Martins Road

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
<p>My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft Local Plan. And any new developments in rural areas will, at the very least, result in:</p> <ul style="list-style-type: none"> · Loss of light or overshadowing · Increased risk of flooding due to 'run-off' · Loss of visual amenity · Limitations to physical activity · Generation of extra traffic, overloading already busy local roads · Extra noise, pollution, disturbance and danger from increased traffic · Loss of trees and other biodiversity – bats, lizards etc. · Loss of natural carbon capture · Decrease in food production capacity · Increased local population placing further pressure on local schools, GP's surgeries and other services, which are already oversubscribed. 	<p>The site allocations are supported by an infrastructure delivery plan which has identified those mitigation measures required to support the site, in infrastructure terms. This has identified the need for financial contributions to improvements in the capacity of local schools and health facilities. There are criteria in the policy in relation to the need for a noise assessment and land contamination assessment to support the delivery of the site. There are also criteria in the policy regarding directing development to lowest sources of surface water flood risk.</p>	No change required	NULLP318	Dr J Austin
<p>TK17 Clause 4 Additional detail is required to be included in the Plan to overcome potential harm identified and to</p>	<p>It is considered that the existing policy wording is consistent with the mitigation measures</p>	No change required	NULLP565 NULLP566	Historic England

consider the cumulative impact to identified heritage assets and how this may be overcome. TK17 Clause 5 Add additional detail about the type of archaeological assessment required.	identified in the Heritage Impact Assessment, prepared by the Council. The site policy requires a site-specific heritage impact assessment also.			
<p>Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound.</p> <ul style="list-style-type: none"> • The policy states that the site is allocated for 40 dwellings. This should be amended to read “approximately 40 dwellings”, to provide flexibility. • Point 6 should be amended to clarify that development within the site itself should be located away from the area which is at risk of surface water flooding (in the west). • Points 12 and 13 refer to financial contributions being required for education and Talke signals. This is not justified. Contributions should be based on the latest need 	<p>Support for the site allocation is noted. On the points raised, it is considered that the wording in the policy is reflective of the Council’s infrastructure delivery plan and strategic flood risk assessment. Paragraph 13.228 notes that the detail at planning application stage may result in minor adjustments to the overall quantum of development achieved on the site.</p>	No change required	NULLP657	Araripe Limited via Agent D Onions (Pegasus Group)

when an application is submitted; it may not be necessary to make these contributions at that stage.				
All these sites have traffic issues already and note recommendations regarding A500, Talke Interchange, A34, A527, which will need major financial assistance. I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.	The Local Plan is supported by an infrastructure delivery plan and a Strategic Transport Assessment [ED011] which identifies where mitigation measures are required to proposed allocation in the Plan.	No change required	NULLP1201	Cllr D Grocott
<p>We do not believe that the FDL plan, insofar as the TK sites are concerned, is consistent with national policy, for the following reasons :</p> <p>a) Transport - please see above re the local road system in the Village.</p> <p>b) Infrastructure - please see above re the Village infrastructure, namely school and health.</p> <p>c) Landscape/Environment - please see above re unnecessary use of Green Belt land for the proposed TK sites. d) Location - please see above re overwhelming a rural village when other brownfield sites and empty houses are available.</p> <p>e) Health - please see above re pollution, degradation of environment, list dispersal, etc.</p>	The Local Plan is supported by an infrastructure delivery plan and a Strategic Transport Assessment [ED011] which identifies where mitigation measures are required to proposed allocation in the Plan. The exceptional circumstances for Green Belt release are set out in the Plan Strategy (housing) paper [ED031]	No change required	NULLP1298	C Butters (Talke Action Group)

119. Policy TK27 Land off Coppice Road

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.	The policy requires access from Coppice Road. Policy criterion 8 also requires improvements to Coppice Road / Merelake Road / Coalpit Lane junction for highway safety reasons	No change required	NULLP 1294	Talke Action Group
<p>My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft Local Plan. And any new developments in rural areas will, at the very least, result in:</p> <ul style="list-style-type: none"> · Loss of light or overshadowing · Increased risk of flooding due to 'run-off' · Loss of visual amenity · Limitations to physical activity · Generation of extra traffic, overloading already busy local roads · Extra noise, pollution, disturbance and danger from increased traffic · Loss of trees and other biodiversity – bats, lizards etc. · Loss of natural carbon capture · Decrease in food production 	<p>The Local Plan is supported by an infrastructure delivery plan which has identified when mitigation measures are required to be delivered through policy. Policy SA1 requires masterplanning and the consideration of amenity impacts through development. Policy TK27 requires that existing hedgerows and trees be retained to help preserve the pattern of enclosure on the site.</p>	No change required	NULLP319	Dr J Austin

capacity · Increased local population placing further pressure on local schools, GP's surgeries and other services, which are already oversubscribed.				
We welcome the additional detail included within clause 4 which helps to set out the issues and mitigation measures required.	Noted	No change required	NULLP575	Historic England
These developments impact Green Belt land, are unsound and should be removed from the plan. They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals.	Policies in the Local Plan require the provision of a minimum of 10% BNG improvements on site. The exceptional circumstances for Green Belt release are considered in the Plan Strategy Topic Paper (Housing) [ED031].	No change required	NULLP767	Mrs C Hoban
SLG is promoting the land off Coppice Road, Talke as a draft allocation for residential development. We strongly support the allocation in the draft plan. • The Site Selection process demonstrates that there are no available sites that make a lesser contribution to the Green Belt purposes.	Noted	No change required.	NULLP843	The Strategic Land Group via J Coxon (Emery Planning)

<ul style="list-style-type: none"> • The impact of removing the site on the overall function and integrity of the wider Green Belt would be limited. • The evidence base and the enclosed Development Prospectus demonstrates that a recognisable and permanent boundary already exists and could be enhanced. 				
All these sites have traffic issues already and note recommendations regarding A500, Talke Interchange, A34, A527, which will need major financial assistance. I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.	The Local Plan is supported by an infrastructure delivery plan and a Strategic Transport Assessment [ED011] which identifies where mitigation measures are required to proposed allocation in the Plan.	No change required	NULLP1202	Cllr D Grocott
What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the	The Council undertakes ongoing monitoring of housing completions and commitments for housing in the Borough.	No change required	NULLP1299	C Butters (Talke Action Group)

suggested quota for e.g. TK27 by a concomitant number.				
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120. Thistleberry

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

121. Policy TB6 Former Pool Dam Pub Site

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Walleys Quarry landfill site lies to the east of TB6, and this is operational with a permission for landfilling until 2042. It is likely therefore that operations will continue throughout the duration of the Local Plan as per the condition (condition 2) attached to the granting of planning permission in 2016.	Noted	No change required	NULLP1107	Staffordshire County Council (J Chadwick)
Walley's Quarry misspelling should be corrected	Noted	To correct the spelling for Walley's Quarry in the policy	NULLP1107	Staffordshire County Council (J Chadwick)
Bullet point/criteria/sub-section 2 should & para 13.235 of the supporting information refers to two separate dates for cessation of operations. These timeframes should both be amended to reflect the restrictions on operations for inert waste & the landfill site's restoration no later than February 2042 (as per condition 2).	Noted, it is proposed to amend paragraph 13.235	To amend paragraph 13.235 as follows: - ...no dwellings on site should be occupied until the disposal of non-hazardous waste at Walley's Quarry until the operation as a landfill site has ceased which is anticipated in 2027...	NULLP1103	Staffordshire County Council (J Chadwick)

122. Policy TB19 Land South of Newcastle Golf Club

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Site is taking away Green Belt Land	Exceptional circumstances are demonstrated in the Plan Strategy Topic Paper for Housing [ED031]	No change required	NULLP209	Sustainable Exercise Partnership
Flood risk concerns	Criterion 6 refers to flood risk implications of the directing development in the site to the surface water flooding.	No change required	NULLP209	Sustainable Exercise Partnership
Concerns over loss of land currently used for food production	The Council has produced a note on best and most versatile land.	No change required	NULLP209	Sustainable Exercise Partnership
Site should be made into a wind and solar park at Keele University	The site is considered suitable for allocation in the Local Plan through the site selection report [ED029]	No change required	NULLP209	Sustainable Exercise Partnership
No reference in the policy of overhead lines which run through the centre of the site	The presence of an overhead power line is included in paragraph 13.250	No change required	NULLP195	National Grid
Ball strike risk assessment should be implemented to assess impact on Newcastle Golf Club	Noted	Proposed to add additional criterion to refer to the need for a ball strike assessment	NULLP212	Sport England
Large allocations to the south of the borough such as TB19 is unbalanced and does not correlate with	The site is considered suitable for allocation in the Local Plan through	No change required	NULLP246	S and S. Anthony

economic activity / public transport connections.	the site selection report [ED029]			
Concerns over cumulative impact of Keele Hall and Keele Hall Conservation Area heritage assets	The allocation wording is consistent with the mitigation measures identified through the Heritage Impact Assessment.	No change required	NULLP576	Historic England
Combined with other large allocations, it places pressure on existing infrastructure	The allocations have been considered through the Infrastructure Delivery Plan	No change required	NULLP1020	Cllr D Jones
Promoting site and support inclusion of site in Local Plan	Noted	No change required	NULLP745	Knights (on behalf of Richborough Estates)
Concerned the proposed link road is too vague and may create additional traffic on the University roundabout	The requirement for the link road is recommended through the Strategic Transport Assessment [ED011]	No change required	NULLP974	Keele Parish Council

123. Policy TB23 Land West of Galingale View

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Wide ranging representation, with a stated objection to all developments on green field sites within the Audley parish and identified others elsewhere in the borough, including TB23. The democratic process locally and nationally & the decisions reached are highlighted, with it considered that no new housing is required, especially as the borough has exceeded its housing targets in recent years. Direct reference of the need for site TB23 (amongst others) is therefore questioned.	Noted. The issues with regard to those sites within Audley Parish and elsewhere are considered against the relevant specific site reference sections of this Consultation Report. Housing need is considered in more detail within ED001 Housing & Economic Needs Assessment 2024 and the broad elements of Housing Supply in Table 2 (p14) of the Local Plan.	No change required	NULLP316	J Austin
Persimmon strongly support the allocation of the site. Considered to offer a highly accessible and sustainable location; it would contribute to a sustainable pattern of development; and it is within proximity to a range of services & facilities. A range of technical and environmental assessments have been undertaken to demonstrate that there are no such constraints to prevent development of the site, subject to suitable mitigation and a sensitive approach to design. Wider	Noted. Support for the allocation is acknowledged, as well as the production of numerous technical & environmental assessments undertaken to address constraints & mitigation.	No change required.	NULLP963	Persimmon Homes NW Ltd (J Power)

benefits including delivery of market & affordable housing and biodiversity gain are also highlighted.				
Walleys Quarry landfill site lies to the east of TB23, and this is operational with a permission for landfilling until 2042. It is likely therefore that operations will continue throughout the duration of the Local Plan as per the condition (condition 2) attached to the granting of planning permission in 2016.	Noted	No change required	NULLP1108	Staffordshire County Council (J Chadwick)
Walley's Quarry misspelling should be corrected	Noted	The spelling is proposed to be amended as a modification	NULLP1108	Staffordshire County Council (J Chadwick)
Owing to the sensitivity of Walley's Quarry, it is questioned as to the suitability of allocating sites (including TB23) in proximity to the landfill. It is also unclear as to whether the evidence base addresses site vulnerabilities, such as land contamination & flood risk from unmodelled watercourses.	This is a matter being considered through a statement of common ground with the Environment Agency	No change required	NULLP1357	Environment Agency (E Millband)
Supporting information: The text in para 13.260 is incomplete and conflicts with that in Policy TB23 with reference to the December 2026 cessation date.	Noted. It is recognised that paragraph 13.260 needs to be corrected such that the sentence relating to the restriction on occupations is complete and aligns with the text in the Policy.	Text to be amended as follows: - ...until the operation of Walleys Quarry as a landfill site <u>importation of non-hazardous waste to Walleys Quarry ceases which is anticipated in 2027...</u>	NULLP1102	Staffordshire County Council (J Chadwick)

124. Town

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

125. Policy TC7 Ryecroft

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Expresses concern about the potential impact on listed heritage assets within the TC7 site. Notes the HIA identifies potential harm but lacks detailed assessment or mitigation measures. Requests additional detail in Clauses 5 and 6 of the policy to ensure any potential harm to heritage assets (including Keele Hall RPG, Keele Hall Conservation Area, and associated assets) can be overcome, and to address the broader cumulative impact and mitigation.	The Council acknowledges Historic England's concerns regarding the potential impact of TC7 on listed heritage assets. The Council confirms that the significance of these assets and their settings, as well as the potential for cumulative impacts, have been carefully considered as part of the Heritage Impact Assessment (HIA) process, as documented in TC7, and supporting evidence base. While the HIA identifies potential harm, the Council maintains that appropriate mitigation measures, as outlined in clauses 5 and 6 of the policy, are sufficient to address these concerns. Specific details regarding the potential impact on Keele Hall RPG, Keele Hall Conservation Area and associated heritage assets will be assessed during the detailed design stage of any development proposal. The Council values Historic England's expertise and will continue to engage with them to ensure the protection of the Borough's heritage assets.	No Changes Proposed	NULLP577	Historic England
Supports the TC7 allocation as a Strategic Centre (Town) allocation. Suggests expanding the policy wording to promote a mix of housing, particularly for older people. Notes that while financial contributions will be required for infrastructure improvements, these should be proportionate and subject to viability.	The Council acknowledges McCarthy Stone's support for TC7 and their suggestion to expand the policy wording to promote a mix of housing, particularly for older people. The Council confirms that the existing policy wording, which allows for a range of uses including residential development, is considered sufficiently flexible to accommodate the specific housing needs of the borough, including housing for older people. This approach	No Changes Proposed	NULLP1015	McCarthy Stone

	avoids unnecessary prescription within the policy and allows for consideration of a mix of housing types and tenures to meet diverse local needs. The Council notes McCarthy Stone's points regarding financial contributions and viability. The Council maintains that these matters are material considerations and will be assessed during the application process, as set out in the NPPF and associated guidance on viability.			
These are essentially the same comment submitted twice, indicating Aspire Housing's support for TC7. They note that a planning application will be submitted for around 45 dwellings at Ryecroft.	These appear to be duplicate comments from Aspire Housing, expressing their support for TC7 and noting their intention to submit a planning application for approximately 45 dwellings at Ryecroft. The Council thanks Aspire Housing for their support and notes their proposed development.	No Changes Proposed	NULLP891	Aspire Housing
			NULLP895	Aspire Housing

126. Policy TC19 Hassell Street Car Park

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

127. Policy TC20 King Street Car Park

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Recommends considering the cumulative impacts of multiple developments and whether additional mitigation measures can be identified to address them.	The Council acknowledges Historic England's recommendation regarding the consideration of cumulative impacts for TC20 and other allocated sites. The Council confirms that the potential for cumulative impacts from the proposed development at King Street Car Park, in conjunction with other developments in the area, has been assessed as part of the Heritage Impact Assessment (HIA), including its setting, as set out in TC20, and supporting evidence base. This assessment considered potential impacts on nearby heritage assets and the wider historic environment. The Council is confident that the proposed mitigation measures are sufficient to address any potential cumulative impacts. Any development will also have regard for Policy SE9: Historic Environment. The Council values Historic England's expertise and will continue to engage with them to ensure the protection of the Borough's heritage assets.	No change required	NULLP578	Historic England

128. Policy TC22 Marsh Parade, Newcastle (former Zanzibar Night Club)

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
<p>Noise Mitigation and The Rigger: The overwhelming majority of respondents express serious concern about the potential impact of the proposed residential development on the operation of The Rigger music venue. They fear noise complaints from future residents could lead to restrictions on the venue's operations, potentially forcing its closure or significantly altering its character. They stress the importance of robust noise mitigation measures, including soundproofing and careful balcony positioning, to ensure compatibility between the residential and commercial uses. Many emphasise The Rigger's cultural significance and economic contribution to the town, urging the Council to protect the venue. Some raise concerns about the adequacy of the noise assessment process and the lack of direct consultation with The Rigger. The application of the Agent of Change principle is also frequently mentioned.</p>	<p>The Council acknowledges the significant community interest in preserving The Rigger music venue and understands the concerns regarding the potential impact of the Marsh Parade development. The Council confirms that any planning application for this site must demonstrate, in accordance with the Agent of Change principle, that the proposed residential units will not be adversely affected by noise from existing businesses, including The Rigger. Furthermore, Policy TC22 requires a 'Noise and odour assessment and mitigation strategy' to be submitted with any planning application. This assessment must demonstrate how the development will mitigate potential noise and other amenity impacts from The Rigger (and other existing businesses) on future residents. This will include consideration of building design and layout, sound insulation, setbacks, and other relevant measures to protect residents from disturbance. Specific noise mitigation measures will be evaluated in detail during the planning application process, considering the unique circumstances of the site and its proximity to The Rigger. The Council recognises The Rigger as a valued cultural venue and its contribution to the local economy and night-time economy and is committed to ensuring its continued operation. The Council will carefully consider these factors</p>	<p>No change required</p>	<p>NULLP70 NULLP101 NULLP259 NULLP260 NULLP249 NULLP464 NULLP456 NULLP467 NULLP458 NULLP799 NULLP683 NULLP1204 NULLP1124</p>	<p>The Rigger J Clarke Circus in a Box Cunning Stunts Cabaret J Higgins K Tideswell C Tolley T Gomes S Dixon A Sharrock A Paterson M Cooke Music Venue Trust G Hood</p>

	when determining any planning application and will only permit development where it is satisfied that The Rigger's continued viability will not be compromised.			
Parking and Traffic: Concerns have been expressed regarding the adequacy of parking provision for the proposed development and its potential impact on traffic flow and congestion in the area, specifically relating to the impact on an already congested one-way street in the locality.	The Council acknowledges the concerns raised regarding parking and traffic. The impact of the development on parking and traffic was considered at a high level during the site assessment process. Any planning application will be required to demonstrate compliance with Policy IN3 (Access and Parking), providing details as to parking provision, as well as Policy IN2: Transport and Accessibility which addresses matters regarding impacts on the local transport network including traffic flow and congestion. Further details can also be found in the Transport Assessment, which sets out a detailed strategy for managing traffic and ensuring access to and from the site, as well as appropriate provision for cycling, walking, and public transport.	No change required	NULLP101	J Clarke
Impact on Existing Businesses: Beyond the specific concerns regarding The Rigger, some comments expressed broader concerns about the impact of the development on other existing businesses in the surrounding area, including difficulties with deliveries and access.	The Council acknowledges concerns about the potential broader impact of the development on existing businesses in the area. Specific details related to access for deliveries, servicing, and other operational needs will be assessed as part of the planning application process. The Council is committed to supporting a vibrant local economy and will work with developers to ensure that any impacts on existing businesses are minimised. For more information, please see Policy IN2: Transport and Accessibility and supporting text and associated evidence. Any proposed plans will need to satisfy the requirements set out in the above policies, including where necessary, a Delivery/ Service Management Strategy to support	No change required	NULLP70 NULLP101	The Rigger J Clarke

	development, including for example the introduction of specific requirements relating to the scheduling of deliveries and collections, the relocation of existing loading and unloading bays, to promote access to and from the site during off-peak hours and in ways that minimise disruption to the wider road network. Further matters regarding access, design and layout requirements can be found in Policies IN3 (Access and Parking) and PSD7 (Design) and their associated documentation.			
Drainage: One commenter expressed concerns regarding existing drainage issues in the area and queried where surface water drainage for the site will discharge to.	The Council acknowledges the concern raised regarding drainage. Any planning application will be required to demonstrate how surface water will be managed sustainably on site, in accordance with Policy SE4: Sustainable Drainage Systems. Specific drainage proposals for the site will be assessed during the planning application process. The Strategic Flood Risk Assessment (SFRA) provides further information on flood risk and drainage considerations for the site.	No change required	NULLP101	J Clarke
Cumulative Heritage Impact: Historic England recommended considering the cumulative impacts of the development on the historic environment, in conjunction with other developments in the surrounding area, for Policy TC22.	The Council acknowledges Historic England's recommendation to consider cumulative impacts for TC22. The Council confirms that any potential cumulative heritage impacts on existing heritage assets in relation to the development will be considered in accordance with Policy SE9: Historic Environment and the HIA for this area during the assessment of any future planning application at this site. The Council will consider any potential impacts from this development alongside other developments and proposals within its setting at planning application stage.	No change required	NULLP579	Historic England

<p>Suitability of Proposed Commercial Units: One commenter questioned the need for additional small business/retail units as part of the Marsh Parade development, given the availability of existing vacant units in Newcastle town centre.</p>	<p>The Council acknowledges the comment regarding the inclusion of commercial units in the Marsh Parade development. The overall concept of mixed-use development for this site, incorporating residential and commercial elements, was considered as part of the site allocation process and is in line with the overarching regeneration objectives for the area, as outlined in Policy RET4 (Newcastle-under-Lyme Town Centre). The specific type and mix of commercial/retail units, their scale and design, and any potential impact on existing facilities in Newcastle town centre will be assessed during the planning application process, in accordance with Policy RET1 (Retail) and other relevant policies, including those relating to the sequential test. This ensures that the proposed commercial element complements the town centre's existing offer and contributes to the vitality of the area.</p>	<p>No change required</p>	<p>NULLP101</p>	<p>J Clarke</p>
<p>Pre-application Consultation/Updates: Aspire Housing note that the Marsh Parade site is currently at the pre-application stage and that revised planning drawings are being prepared. They anticipate submitting a planning application.</p>	<p>The Council acknowledges Aspire Housing's representation regarding TC22. The Council notes Aspire Housing's confirmation that the site is at the pre-application stage and that revised planning drawings are being prepared following consultation feedback. The Council appreciates this update and looks forward to receiving a planning application for the site in due course.</p>	<p>No change required</p>	<p>NULLP887</p>	<p>Aspire Housing</p>

129. Policy TC40 Car Park, Blackfriars Road

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Requests that details be added to the policy regarding the potential impact on Grade II* St Giles Church and necessary mitigation measures. Also requests additional detail about other heritage assets potentially harmed by the development and suggests incorporating specific mitigation measures into the plan.	The Council acknowledges Historic England's representation regarding TC40 and the potential impact of the proposed development on nearby heritage assets, including St Giles Church. The Council confirms that the significance of these assets, including their setting, has been carefully considered as part of the Heritage Impact Assessment (HIA), as referenced in the supporting text to TC40. The policy requires any development proposal to conserve and, where possible, enhance heritage assets, and specific mitigation measures to address any potential harm will be evaluated during the detailed design stage of the development, in accordance with Policy SE9: Historic Environment and the Agent of Change Principle, as set out in the NPPF. This phased approach allows for a detailed and site-specific assessment of potential impacts, while the Local Plan establishes the overall strategic framework for development. The Council values Historic England's expertise and will continue to work with them throughout the planning process.	No change required	NULLP580	Historic England

130. Policy TC45 York Place

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Like their comment on TC40, Historic England requests details regarding the potential impact on St Giles Church and necessary mitigation. They also request more information about other affected heritage assets and the incorporation of specific mitigation measures, as well as consideration of cumulative impacts from multiple proposed allocations affecting the same heritage assets.	The Council acknowledges Historic England's representation regarding TC45 and the potential impact of the proposed development on nearby heritage assets, including St Giles Church. The Council confirms that the significance of these assets and their settings has been carefully considered as part of the Heritage Impact Assessment (HIA) for this site, as documented in the supporting text to TC45, which also refers to the potential impacts on other heritage assets. The policy requires any development proposal to conserve and enhance these heritage assets where possible, and any necessary mitigation measures will be evaluated during the detailed design stage of the development. The Council will ensure that any proposed development is in line with the requirements of Policy SE9: Historic Environment, incorporating site-specific elements as well as a consideration to the cumulative impacts from the number of proposed allocations highlighted by Historic England, including assessments on how this can be overcome. The Council values Historic England's expertise and will continue to work with them throughout the planning process.	No change required	NULLP581	Historic England

131. Policy TC50 Land at Cherry Orchard Car Park

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
This comment mirrors those submitted for policies TC20, TC40, and TC45. Historic England again requests details be added to the policy regarding the potential impact on St Giles Church and necessary mitigation. They also request additional detail about other heritage assets potentially harmed by the development and the incorporation of specific mitigation measures into the plan, and for consideration of cumulative impacts from multiple proposed allocations affecting the same heritage assets. Essentially, Historic England wants to ensure the policy adequately addresses potential impacts on nearby heritage assets and considers the cumulative effects of development in the area.	The Council acknowledges Historic England's representation regarding TC50 and the potential impact of the proposed development on nearby heritage assets, including St Giles Church. The Council confirms that it has assessed the potential impacts of development on these assets and their settings, in accordance with Policy SE9: Historic Environment and the supporting text. The specific mitigation measures required to address any potential harm, and any cumulative impacts from other developments in the area, will be evaluated during the detailed design stage of any development proposal for the site, as set out within TC50, which demonstrates that these elements will be considered at the appropriate stage. The Council values Historic England's expertise and will continue to engage with them throughout the planning process.	No Changes Proposed	NULLP582	Historic England

132. Policy TC52 Goose Street Car Park

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Like their comments on other Town Centre allocations (TC20, TC40, TC45, and TC50), Historic England requests additional detail be included in the plan relating to heritage assets where harm could occur. They note the HIA provides <i>some</i> additional detail but believe mitigation measures need to be more specific to ensure harm is overcome/mitigated. This suggests they want more specific and actionable mitigation measures within the policy itself, rather than just general statements about considering heritage impacts.	The Council acknowledges Historic England's representation regarding TC52 and the potential impact of the proposed development on nearby heritage assets. The Council confirms that the significance of these assets, including the Holy Trinity RC Church and The Barracks Workshops (Grade II Listed Buildings) and their setting has been carefully considered as part of the Heritage Impact Assessment (HIA) and supporting text to TC52, which incorporates details of the potential impacts to these assets. The HIA informs policy decisions on heritage and considers any potential harm. Any required mitigation measures will be evaluated at the detailed design stage of any development proposal for the site, as outlined in national policy and guidance, including Policy SE9: Historic Environment and the NPPF, and in accordance with the Agent of Change principle, and existing buildings have regard for Policy CRE1 Climate Change. The Council values Historic England's expertise and will continue to engage with them throughout the planning process.	No Changes Proposed	NULLP583	Historic England

133. Policy TC71 Midway Car Park

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Asks how the Newcastle-under-Lyme Conservation Area will be affected by the development and what mitigation measures will be incorporated. Expresses concern about the potential impact on archaeological remains (considered high for this site) and requests information on mitigation measures to address this.	The Council acknowledges Historic England's representation regarding TC71 and the potential impact of the proposed development on the Newcastle-under-Lyme Conservation Area and nearby heritage assets, including the potential impacts on archaeological remains. The Council confirms that the setting of the Conservation Area and the significance of these assets have been carefully considered as part of the Heritage Impact Assessment (HIA), as documented in the supporting information to TC71. The policy requires any development to conserve and, where possible, enhance these heritage assets, and specific mitigation measures to address any potential harm will be evaluated during the detailed design stage of the development, in accordance with Policy SE9: Historic Environment and the Agent of Change Principle, as well as other relevant policies and national guidance. The potential for archaeological remains and the impact of the proposed development on these, along with any required mitigation, will be assessed through an archaeological assessment during the planning application process, as set out in Policy SE9, and requirements in relation to the layout and design of the development and access will be secured in accordance with Policies PSD7 (Design) and IN3 (Access and Parking) respectively. The Council values Historic England's expertise and	No Changes Proposed	NULLP584	Historic England

	will continue to engage with them throughout the planning process.			
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134. Glossary

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

135. Appendix 1 Monitoring Framework

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
<p>The Plan is unsound as it does not contain a clear plan for monitoring its delivery and taking effective action if under delivery of housing is observed.</p> <p>Such a policy does nothing to address the housing crisis or undersupply of homes.</p>	<p>The monitoring framework is set out in Appendix 1 of the Local Plan which will monitor the delivery of the Local Plan.</p>	<p>No change required</p>	<p>NULLP862</p>	<p>Home Builders Federation (R Danemann)</p>

136. [Appendix 2 Saved Policies](#)

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

137. Appendix 3 Parking Standards

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The Local Plan could and should do more to encourage/deliver more secure forms of cycle storage and reduce criminal opportunity.	Appendix 3 considers car parking requirements for pedal cycles including storage requirements.	No change required	NULLP613	Staffordshire Police

138. [Appendix 4 Commitments since 31 March 2023](#)

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
No comments received				

139. Appendix 5 Design Code for Historic Farmsteads

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
The proposed site allocation of AB2/AB2a is in direct conflict with this policy - as the site contains an old farmstead Brook Farm which will be destroyed if the site allocation is progressed.	The site AB2 and the proposed allocation is justified through the site selection report and associated evidence	No change required	NULLP339	C Withington

140. Appendix 6 Indicative Housing Trajectory

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
This is not a clearly evidenced nor robust trajectory and does not provide a sufficient piece of evidence to inform the Local Plan.	The trajectory is supported by the Housing Supply and Delivery Topic Paper [ED033]	No change required	NULLP748	Gladman Developments Ltd (R Wilding)
A site-by-site breakdown should be provided. To be both justified and effective the Housing Trajectory should also include break down the housing numbers into different sources of supply.	The trajectory is supported by the Housing Supply and Delivery Topic Paper [ED033]	No change required	NULLP863	Home Builders Federation (R Danemann)
Full list of housing sites and allocations should be provided to corroborate the chart in Appendix 6	The trajectory is supported by the Housing Supply and Delivery Topic Paper [ED033]	No change required	NULLP967	Pegasus on behalf of Keepmoat Homes

141. Appendix 7 Final Draft Local Plan Site Allocation Maps

Summary of Main Issues Raised	Council Response	Potential Change to Plan	Respondents Unique ID	Respondents Name
Policies Map – terminology should be consistent with that used in the Plan, for example proposed development boundary at Keele University	The settlement boundaries have been defined with regard to evidence base document ED007 Settlement Boundary Review, with the Supporting Information to Policy PSD4 Development Boundaries and the Open Countryside further elucidating its rationale and consequent justification for being presented as such within the Policies Map.	No change required	NULLP804	Keele University
Site RC8 is not referenced in the Plan document but does appear on Map 7 Kidsgrove Ward Map as an allocation. This is a Plan anomaly	The site RC8 is listed in Appendix 4 of the Local Plan, as a commitment and is shown on the policies map to represent this point.	No change required	NULLP243	Wardell Armstrong on behalf of S and S Anthony
Objection to housing & warehousing on greenbelt land in Audley. Specific reference to the provisions on the NPPF re: greenbelt release & the exploration of alternatives including the use of brownfield land.	Noted. Considered further against the various Audley site specific allocation sections.		NULLP4 NULLP159 NULLP196	BSL Communications Service Ltd (J Moss) M Guest G Higgins

Development on the Green Belt is considered to have significant detrimental impacts on the existing community's quality of life and the local environment. These include increased pollution, traffic & infrastructure pressures, and the role that these areas currently play for recreation as well as in providing habitats for wildlife, contributing to biodiversity, and tackling climate change.	Noted. Evidence base documents ED008 Green Belt Assessment, ED029 Site Selection Report & Assessments, and the Strategic Housing & Employment Land Availability Assessment ED006 have been key components in the evaluation of individual sites, including those currently located in the Green Belt which are proposed for allocation in accordance with Policy PSD5 and their respective site-specific allocations.	No change required	NULLP4 NULLP159 NULLP196 NULLP433	BSL Communications Service Ltd (J Moss) M Guest G Higgins M Colclough
The primary driver of the location of AB2 is regarded as its proximity to the M6 northwestern corridor, rather than local need or satisfying the wider economic growth of the borough. The size of AB2 is far in excess of the identified need and the types of jobs offered would be inconsistent with building a skilled workforce.	Noted. Considered further against the AB2 Land at J16 of the M6 site specific allocation section.	No change required	NULLP196	G Higgins
Due consideration has not been made to the impact on local transport infrastructure (including from additional generated by prospective employees & HGV/commercial vehicles), with the	Noted. Considered further against the AB2 Land at J16 of the M6 site specific allocation section.	No change required	NULLP196 NULLP433	G Higgins M Colclough

site (AB2) having little to no existing public transport links meaning travel will be primarily by road. The site sits within a congested link with regular issues forcing traffic to re-route into the local villages and A50 & A34 routes. It is therefore contradictory to national planning policy for promoting sustainable development.				
Proposals for site AB12 are considered unsound owing to the main access route off Diglake St. being unsuitable. Resident parking & visibility when exiting on to Ravens Lane are considered particularly restrictive.	Noted. Considered further against the AB12 Land East of Diglake Street site specific allocation section.	No change required	NULLP426	B Brereton
The natural & historic environment impacts on wildlife (badgers, foxes, birds) and on the setting of Wedgwood Monument are felt to be significant issues. Flood risk may worsen & infrastructure pressures on schools, roads & medical facilities would also be exacerbated by development taking place at AB12.	Noted. Considered further against the AB12 Land East of Diglake Street site specific allocation section.	No change required	NULLP426	B Brereton
There are alternative employment sites available, 2-3 miles south on the A34 and on Peacocks Hay Road which could be further developed.	Noted. Considered further against the AB2 Land at J16 of the M6 site specific allocation section.	No change required	NULLP433	M Colclough
Strong objection, in particular to the site AB2, is reaffirmed.	Noted. Considered further against the AB2	No change required	NULLP334	Audley Parish Council

	Land at J16 of the M6 site specific allocation section.			
The policies map should be amended to show the land at Slacken Lane, Kidsgrove as a residential allocation, rather than be shaded green as open space – the value for recreational use is questioned owing to factors such as its past use as a tipping ground for colliery waste, safety concerns and it being private land. The site is subject to a current planning application (with significant accompanying technical work undertaken) and is considered available, suitable, and deliverable with a housebuilder in place.	Noted. Whilst acknowledging the pending consideration (at the time of writing) planning application for this site, the Council maintains that the site allocations included in the Local Plan are those best suited to meet the Borough's development needs, as demonstrated through a robust site selection process. The suitability of each proposed allocation, including considerations of deliverability, access to services, has been thoroughly assessed as set out in the site allocations policies (Chapter 13) and supporting text.	No change required	NULLP909	Gleeson Regeneration Limited (M Wedderburn)
Land to the south of High St. Newchapel should be added to the list of allocated residential sites & the land be removed from the Green Belt accordingly. Reasons for this include that the site is well constrained by existing built form on three sides and that a strongly	Noted. The Council maintains that the site allocations included in the Local Plan are those best suited to meet the Borough's development needs, as demonstrated through a robust site	No change required	NULLP802	Seddon Homes (M Wedderburn)

defined & permanent boundary to the Green Belt can be achieved. Landscape & visual impacts of development are such that there is little or no visual connection with the surrounding road network, and little to no overlooking of the proposed development. Overall amenity landscape & visual impacts are not considered to exceed minor adverse. The site can therefore be released without harm to the Green Belt and its purposes.	selection process. The suitability of each proposed allocation, including considerations of deliverability, access to services and other constraints, has been thoroughly assessed as set out in the site allocations policies (Chapter 13) and supporting text			
Land to the west of Newcastle Road, Talke is identified and promoted as suitable for accommodating electric vehicle charging facilities and associated development/uses for visiting members of the public. It is considered that there would be no harm to the wider Green Belt and its purposes. Therefore, it should be allocated accordingly, and the Policies Map be amended accordingly.	Noted. the Council maintains that the site allocations included in the Local Plan are those best suited to meet the Borough's development needs, as demonstrated through a robust site selection process. The suitability of each proposed allocation, including considerations of deliverability, access to services, and relationship to Green Belt and other constraints, has been thoroughly assessed as set out in the site allocations policies (Chapter 13) and supporting text.	No change required	NULLP716	Evolution 500 (B Weatherley)

Site LW53 sits outside the development boundaries which were set as the village envelope agreed as part of the Loggerheads Neighbourhood Plan. No justification for this amendment has been given, nor prior engagement with the Parish Council or local residents concerning this change. It is considered that the change has been made purely to include LW53 as a potentially suitable site for development.	Noted. Considered further against the LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads site specific allocation section	No change required	NULLP1167	Loggerheads Parish Council (J Love)
Map 1: Audley Ward Map Strong objection, in particular to the site AB2, is reaffirmed. Detailed arguments as to the Green Belt impacts & justification for release, concerns expressed by neighbouring authorities, impact on landscape character as well as traffic & infrastructure are highlighted.	Noted. Please refer to the Council's response to each respective site's comments provided within the discrete sections (titled with the appropriate site reference – in this case, AB2 Land at J16 of the M6) of this Consultation Report	No change required.	NULLP1211 NULLP1242 NULLP1289	N Brogan P Moreau S Barnish
Map 1: Audley Ward Map Access concerns via Diglake St. for the AB12 site, with wider existing road network challenges. Loss of well-used recreation space and the capacity of schools, medical facilities and the current retail offer is not sufficient to serve additional homes in the area.	Noted. Please refer to the Council's response to each respective site's comments provided within the discrete sections (titled with the appropriate site reference – in this case, AB12 Land East of Diglake Street) of this Consultation Report	No change required	NULLP1289	S Barnish

Map 1: Audley Ward Map For sites AB33 & AB15 the capacity of schools, medical facilities and the current retail offer is not sufficient to serve additional homes in the area. Further traffic will bring greater highway safety issues.	Noted. Please refer to the Council's response to each respective site's comments provided within the discrete sections (titled with the appropriate site reference – in this case, AB15 Land North of Vernon Avenue & AB33 Land off Nantwich Road/Park Lane, Audley) of this Consultation Report	No change required.	NULLP1289	S Barnish
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